

# The Decentralisation of EU Digital Regulation

Alba Ribera Martínez\* and Jesús Calderón Argüello†

## ABSTRACT

The enforcement of EU digital law stands at a structural crossroads. This chapter interrogates the apparent tension between the centralisation and verticalization impulse of EU institutions and the structural reality of decentralised application at the national level, by arguing that the dichotomy between centralised and decentralised enforcement is, in practice, far more porous than conventional doctrinal analysis concedes.

Drawing on a bottom-up empirical mapping of the national implementation of four landmark digital instruments, the Digital Markets Act, the Digital Services Act, the Artificial Intelligence Act, and the Platform-to-Business Regulation, across all 27 Member States, the chapter identifies and reinstates three defining trends in the enforcement of the EU's digital *acquis*. First, the phenomenon of EU law brutality, whereby the EU legislator's top-down imposition of new regulatory concepts, and institutional mechanisms disrupts existing national frameworks with deliberate disregard for Member State idiosyncrasies. Second, the incidental character of digital enforcement, conditioned by the regulatory density and technical complexity of the rules involved, which generates uneven compliance performance across jurisdictions. Third, the persistence of *de facto* decentralisation, which is a structural reality that reasserts itself, irrespective of the enforcement model formally chosen by the EU legislator in each digital rule.

The chapter demonstrates that, even where EU institutions purport to centralise enforcement, decentralisation operates as a gravitational force at the implementation stage. Member States selectively allocate competences to authorities structurally detached from the object of regulation and calibrate their enforcement efforts according to domestic political priorities rather than legal obligations. Enforcement data further reveals that enforcement architecture design, centralised or hybrid, directly conditions the depth and breadth of national legislative disruption, with decentralised and hybrid models consistently generating broader and more uneven national adaptation than their centralised counterparts.

In doing so, the chapter exposes a contradiction embedded in the EU's digital strategy. The EU legislator adopts legislation based on the premise of uniformity. In turn, the regulatory ambition is delivered at the national level through an enforcement architecture that structurally rewards fragmentation. These findings carry significant implications for the coherence and effectiveness of the EU's digital single market and invite a reassessment of the institutional design choices underpinning the EU's digital governance framework.

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\* Lecturer in Competition Law at University Villanueva and Visiting Professor in Digital Markets Regulation at the Brussels Study Center (Brussels School of Competition). ORCID: 0000-0002-9152-0030. Corresponding author, email: [riberamartinezalba@gmail.com](mailto:riberamartinezalba@gmail.com). According to the ASCOLA Declaration of Ethics, the author has nothing to disclose.

† PhD Student at Universidad San Pablo-CEU. ORCID: 0009-0002-4299-8000. According to the ASCOLA Declaration of Ethics, the author has nothing to disclose

## I. INTRODUCTION

The enforcement of EU law has never been a seamless exercise. From its earliest foundations, the EU legal order has relied on a structural tension between the uniformity of its legislative output and the heterogeneity of its implementation, delegating to Member States the primary responsibility for giving effect to norms adopted at supranational level.<sup>1</sup> That tension, long managed through the principles of direct effect,<sup>2</sup> primacy,<sup>3</sup> and sincere cooperation,<sup>4</sup> has acquired renewed salience in the context of the EU's accelerating digital agenda.<sup>5</sup>

The post-GDPR<sup>6</sup> digital *acquis* represents one of the most ambitious and institutionally disruptive regulatory projects in the history of EU integration, deploying regulations, rather than directives, as its preferred instrument of harmonisation. It introduces new concepts and enforcement mechanisms into the legal systems of Member States at a pace and with a disregard for national idiosyncrasies that is, in many respects, novel.<sup>7</sup>

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<sup>1</sup> On this tension spanning different areas of EU law, see Jonathan Zeitlin and Bernardo Rangoni, 'EU regulation between uniformity, differentiation, and experimentalism: Electricity and banking compared' (2022) 24(1) *European Union Politics* 121-142; Asya Zhelyazkova, 'From selective integration into selective implementation: The link between differentiated integration and conformity with EU laws' (2026) 53(4) *European Journal of Political Research* 727-746; and Sebastiaan Princen and Michiel Luchtman, 'Differentiation, uniformity and level playing fields in the enforcement of EU law' (2023) *Jean Monnet Network on EU Law Enforcement Working Paper Series*, No. 17-23, available at <https://jmn-eulen.nl/wp-content/uploads/sites/575/2023/08/WP-Series-Princen-and-Luchtman-002.pdf>.

<sup>2</sup> The Court of Justice defined the main tenets of the principle of direct effect in Case 26-62, *NV Algemene Transport- en Expeditie Onderneming van Gend & Loos v Netherlands Inland Revenue Administration* [1963] ECR I-1; Case 43-75, *Gabrielle Defrenne v Société anonyme belge de navigation aérienne Sabena* [1976] ECR I-455; and Case 41-74, *Yvonne van Duyn v Home Office* [1974] ECR I-1337.

<sup>3</sup> Similarly with the principle of primacy, see Case 6-64, *Flaminio Costa v E.N.E.L.* [1964] ECR I-585; Case 106/77, *Amministrazione delle Finanze dello Stato v Simmenthal SpA* [1978] ECR I-629; and Case C-399/11, *Stefano Melloni v Ministero Fiscale* (Grand Chamber of the Court of Justice, 26 February 2013).

<sup>4</sup> With reference to how the principle of sincere cooperation was first construed, see Case 39-72, *Commission of the European Communities v Italian Republic* [1973] ECR I-101; Case C-265/95, *Commission of the European Communities v French Republic* [1997] ECR I-6959; and Case C-316/19, *European Commission v Republic of Slovenia* (Grand Chamber of the Court of Justice, 17 December 2020).

<sup>5</sup> During the last decade, the European Union has been quite active in complementing the legal framework attending to the digital space via Shaping Europe's digital future within its broader Digital Strategy. During the last year, however, deregulation and simplification characterise the European Commission's Digital Omnibus Package, aimed at easing compliance for businesses in digital markets, see European Commission, 'Simpler EU digital rules and new digital wallets to save billions for businesses and boost innovation' (*Shaping Europe's digital future*, 19 November 2025), available at <https://digital-strategy.ec.europa.eu/en/news/simpler-eu-digital-rules-and-new-digital-wallets-save-billions-businesses-and-boost-innovation>.

<sup>6</sup> Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation) [2016] OJ L 119/1.

<sup>7</sup> Building on the work of Vagelis Papakonstantinou and Paul de Hert, 'The Regulation of Digital Technologies in the EU: The law-making phenomena of 'act-ification', 'GDPR mimesis' and 'EU law brutality'' (2022) *Technology and Regulation* 48, 52-56.

Beneath the surface uniformity that the choice of regulations formally guarantees, a more complex and contested enforcement reality is taking shape. The EU legislator's embrace of centralised and verticalized enforcement, most visibly in the Digital Markets Act,<sup>8</sup> coexists, paradoxically, with the persistence of decentralisation at the implementation stage.<sup>9</sup> Member States designate different authorities, attribute divergent competences, adapt the new regulatory concepts with varying degrees of fidelity, and calibrate their enforcement ambition in line with domestic political priorities. The result is not the uniform digital single market that the EU's regulatory strategy promises, but an enforcement patchwork<sup>10</sup> whose internal differentiation is no less pronounced for being largely invisible to institutional analysis conducted exclusively at the EU level.

This chapter seeks to make that patchwork visible. It does so by interrogating the enforcement of four landmark digital instruments: the Digital Markets Act (DMA), the Digital Services Act (DSA),<sup>11</sup> the Artificial Intelligence Act (AI Act),<sup>12</sup> and the Platform-to-Business Regulation (P2B Regulation)<sup>13</sup> across all 27 Member States, from a bottom-up empirical perspective.

In mapping national implementation choices, the chapter identifies and confirms the emergence and consolidation of three structural trends that characterise the enforcement of the post-GDPR digital *acquis*. The first is EU law brutality,<sup>14</sup> which is the systematic disruption of existing national legal frameworks produced by the EU legislator's top-down imposition of new regulatory concepts and institutional mechanisms that take no account of pre-existing national arrangements. The second is the incidental character of

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<sup>8</sup> Regulation (EU) 2022/1925 of the European Parliament and of the Council of 14 September 2022 on contestable and fair markets in the digital sector and amending Directives (EU) 2019/1937 and (EU) 2020/1828 (Digital Markets Act) [2022] OJ L 265/1.

<sup>9</sup> This was already identified as a main characteristic of the DMA's enforcement system in Alba Ribera Martínez, 'The Decentralisation of the DMA's Enforcement System' (2024) 73(12) GRUR International: *Journal of European and International IP Law* 1111.

<sup>10</sup> The notion was initially introduced in Mónica García Quesada, 'The EU as an 'enforcement patchwork': The impact of national enforcement for compliance with EU water law in Spain and Britain' (2013) 34(2) *Journal of Public Policy* 331.

<sup>11</sup> Regulation (EU) 2022/2065 of the European Parliament and of the Council of 19 October 2022 on a Single Market For Digital Services and amending Directive 2000/31/EC (Digital Services Act) [2022] OJ L 277/1.

<sup>12</sup> Regulation (EU) 2024/1689 of the European Parliament and of the Council of 13 June 2024 laying down harmonised rules on artificial intelligence and amending Regulations (EC) No 300/2008, (EU) No 167/2013, (EU) No 168/2013, (EU) 2018/858, (EU) 2018/1139 and (EU) 2019/2144 and Directives 2014/90/EU, (EU) 2016/797 and (EU) 2020/1828 (Artificial Intelligence Act) [2024] OJ L 1689.

<sup>13</sup> Regulation (EU) 2019/1150 of the European Parliament and of the Council of 20 June 2019 on promoting fairness and transparency for business users of online intermediation services [2019] OJ L 186/57.

<sup>14</sup> The term was coined by Papakonstantinou and de Hert (n 7), 56-57.

digital enforcement. It takes place via the uneven and, at times, fortuitous quality of compliance performance across Member States, which is conditioned by the regulatory density and technical complexity of the rules at stake. The third and most consequential tenet is the persistence of *de facto* decentralisation. It is a structural gravitational pull towards fragmented implementation that reasserts itself at the national level, irrespective of the enforcement model formally selected by the EU legislator.

The chapter proceeds as follows. Section II locates the chapter's bottom-up approach within the broader literature on EU enforcement structures, tracing the evolution from the traditional decentralised model to the increasingly verticalized and centralised arrangements that have characterised the post-GDPR period. The section situates the digital *acquis* within that trajectory. Section III presents the empirical findings generated by the authors' bottom-up mapping of national implementation, organising the analysis around the three structural trends identified above and examining their manifestation across the four digital instruments that have been selected. Section IV draws together the chapter's findings and reflects on their implications for the institutional design of EU digital governance and the coherence of the digital single market.

Two preliminary reservations are warranted. First, the chapter does not contest the formal enforcement structures as designed by the EU legislator. Its ambition is to consider what happens when those enforcement structures meet the heterogeneity of 27 different national legal orders. Second, the four instruments selected for analysis are not exhaustive of the digital *acquis*. However, they are sufficiently varied in their enforcement architecture (spanning fully centralised, hybrid, and predominantly decentralised models) to generate findings of broader systemic relevance for EU digital rules as a whole. Together, they offer a representative litmus test for the structural dynamics that this chapter seeks to illuminate.

## II. THE EUROPEAN COMMISSION AS THE GUARDIAN OF DECENTRALISED ENFORCEMENT STRUCTURES

The European Commission (EC) acts as guardian of the Treaties by virtue of Article 17 TEU.<sup>15</sup> The task entails that the EC monitors the implementation and application of EU law by the Member States, so that they are adequately reconciled with the Treaties. Articles 258 and 260 TFEU<sup>16</sup> confer the EC general enforcement powers to trigger infringement proceedings against Member States before the Court of Justice when they act in breach of their obligations under EU law.

Traditionally, the exercise of the EC's prerogative to bring infringement proceedings against Member States merits the description of centralised enforcement.<sup>17</sup> Given that the EU depends on the compliance of Member States for the fulfilment of its goals and the implementation of its laws, the deliberate refusal of a Member State to implement EU law strikes at the fundamental basis of the EU's legal order.<sup>18</sup> On the contrary, EU governance has traditionally relied on decentralised enforcement.<sup>19</sup> Individuals are endowed with the tools to assert their EU rights before national courts at the Member State level due to the principle of direct effect.<sup>20</sup>

Stemming from this clear separation, the same division of competences is applied to almost all policy fields in EU law. The Member States enforce the rules, whilst the Commission oversee their implementation.<sup>21</sup> Exceptions to the rule cover fields such as competition policy, banking supervision, or environmental policy. In this case, diverging interests in these fields between different Member States lead to obstacles, and the EC's

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<sup>15</sup> Treaty on European Union [2016] OJ C 202/13.

<sup>16</sup> Treaty on the Functioning of the European Union [2012] OJ C 326/47.

<sup>17</sup> Roland Bieber and Francesco Maiani, 'Enhancing Centralized Enforcement of EU Law: Pandora's Toolbox?' (2014) 51 *Common Market Law Review*, 1062.

<sup>18</sup> Case 39/72, *Commission v. Italy* [1973] ECR 101, para 25.

<sup>19</sup> Decentralised enforcement of EU law is defined as a shift in costs and responsibility of monitoring state behaviour to national courts. For instance, see Denise Carolin Hübner, 'The decentralized enforcement of European law: National court decisions on EU directives with and without preliminary reference submissions' (2018) 25(12) *Journal of European Public Policy* 1817.

<sup>20</sup> Case 26/62, *NV Algemene Transport- en Expeditie Onderneming van Gend & Loos v Netherlands Inland Revenue Administration* [1963] ECR 1; Case 6/64, *Flaminio Costa v. E.N.E.L.* [1964] ECR 585; Case 106/77, *Amministrazione delle Finanze dello Stato v. Simmenthal SpA* [1978] ECR 629; Joined Cases C-6 and 9/90, *Andrea Francovich and Danila Bonifaci and others v Italian Republic* [1991] ECR 5357. For further reference, Francesca Episcopo, '9 – The Vicissitudes of Life at the Coalface: Remedies and Procedures for Enforcing Union Law Before National Courts' in Paul Craig and Gráinne de Búrca (eds.), *The Evolution of EU Law* (OUP 2021), 275-306.

<sup>21</sup> Miroslava Scholten, Martino Maggetti and Esther Versluis, '14. Political and judicial accountability in shared enforcement in the EU' in Miroslava Scholten and Michiel Luchtman (eds.), *Law Enforcement by EU Authorities* (Elgar 2017), 353-376.

role remains key to enforce EU legislation. The general rule is that all Member States are responsible for their own enforcement regime, in the application of the principle of institutional autonomy.<sup>22</sup> Given that each Member State's institutional frameworks are different,<sup>23</sup> the application of EU rules follows the course of an enforcement patchwork.<sup>24</sup>

Despite the fact that the fundamental arrangements in the Treaties have not changed, over the last ten years, the EU legislator has incrementally delegated more enforcement tasks to the EU level,<sup>25</sup> termed as the verticalization of enforcement.<sup>26</sup> Those delegations have taken place via secondary law, either in the form of regulations or directives, even though there is a recognised political shift in favour of legislating through regulations as of late.<sup>27</sup> Verticalisation is not monolithic in its manifestations and has taken several forms, such as the granting of full enforcement powers to the EU or the setting up of networked roles with the Member States.<sup>28</sup>

In sum, the EU has become increasingly involved in the direct enforcement of EU law. Such a change is motivated by the fact that regulations are more attuned to addressing the fragmentation of the single market in promoting innovation and growth. They promote uniformity by constraining the discretion of the Member States when implementing EU law.<sup>29</sup> The progressive change has led to the emergence of a multi-level and multi-faceted enforcement system where new institutions are involved, a broader range of enforcement

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<sup>22</sup> J.H. Jans, R. de Lange, Sacha Prechal and R. Widdershoven, *Europeanisation of Public Law* (Europa Law Publishing 2007).

<sup>23</sup> There is nothing inherently negative in institutional differences based on national identities, as recognised in Article 4 TEU. For further reference, see Eva Thomann and Asya Zhelyazkova, 'Moving beyond (non)compliance: The customization of European policies in 27 countries' (2017) 24(9) *Journal of European Public Policy* 1269. Arguing that national institutional differences can inhibit convergence, see Frans Van Waarden, 'Power to the legal professionals: Is there an Americanization of European law?' (2009) 3(3) *Regulation & Governance* 197.

<sup>24</sup> García Quesada (n 10), 331.

<sup>25</sup> Annetje Ottow, 'Europeanization of the Supervision of Competitive Markets' (2012) 18(1) *European Public Law* 191; and Miroslava Scholten and Annetje Ottow, 'Institutional Design of Enforcement in the EU: The Case of Financial Markets' (2014) 10(5) *Utrecht Law Review* 80.

<sup>26</sup> Scholten, Maggetti and Versluis (n21), 356; Miroslava Scholten, 'Mind the trend! Enforcement of EU law has been moving to 'Brussels' (2017) 24(9) *Journal of European Public Policy* 1348.

<sup>27</sup> Sara Drake and Carmela Bosangit, 'Putting the citizen at the centre of EU enforcement' (JURI Committee, October 2025), 13; and Maurizia de Bellis, 'Monitoring the implementation of EU law in areas where the Commission's 2023 Annual report on monitoring the application of EU law, the Draghi and Letta reports overlap' (JURI Committee, October 2025).

<sup>28</sup> Mariolina Eliantonio and Federica Cacciatore, 'When the EU takes the field. Innovative forms of regulatory enforcement in the fisheries sector' (2022) 44(4) *Journal of European Integration* 551 argue that verticalisation assumes different categorisations depending on the enforcement process itself.

<sup>29</sup> Drake and Bosangit (n 27), 13; and A.J.C. de Moor-van Vugt and R.J.G.M. Widdershoven, 'Chapter 5. Administrative Enforcement' in J.H. Jans, S. Prechal and R.J.G.M. Widdershoven (eds.), *Europeanisation of Public Law* (Europa Law Publishing 2025), 263-330.

strategies are considered, and the involvement of non-state actors is taken for granted.<sup>30</sup> In turn, the increased weight on the EU's shoulders drives a greater breach in deterrence, because the risk of non-compliance with the rules has grown. There is an inherent collision between the principle of sincere cooperation that binds together authorities at the national and EU level with the rule of law requirements stated in Article 2 TEU.<sup>31</sup>

In this multi-faceted and multi-level framework, the EU legislator has formed different enforcement structures, influenced by several factors, such as the path dependencies of the different sectors, the constitutional framework surrounding them, and the political considerations of the sector.<sup>32</sup> Each sector has followed a different direction in terms of the enforcement structures that protect the rights vested in individuals and undertakings. Depending on the sector, the EU legislator designs a legal framework's enforcement structure with centralisation or decentralisation in mind, when unconstrained by the TFEU.

Centralised enforcement structures entail that the EU assumes the main tasks of monitoring, application, and implementation of a given rule. Enforcement tasks are coordinated, shared, or entirely executed at the EU level, either through enforcement networks or dedicated agencies.<sup>33</sup> Defaulting enforcement of EU laws due to the lack of uniformity in its application and the ineffectiveness of EU policies has forced the hand of the EU legislator in some fields that have warranted a comeback towards centralised enforcement structures.<sup>34</sup> The banking sector steered towards a centralised enforcement structure as a response to the 2008 financial sector,<sup>35</sup> whilst it had formerly been

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<sup>30</sup> Sara Drake and Melanie Smith, *New Directions in the Effective Enforcement of EU Law and Policy* (Edward Elgar Publishing 2016).

<sup>31</sup> Tying uneven enforcement in the rule of law framework, see Simona Demková and Giovanni De Gregorio, 'The Looming Enforcement Crisis in European Digital Policy: A rule-of-law centered path forward' (Verfassungsblog, 10 February 2025), available at [verfassungsblog.de/the-looming-enforcement-crisis-ai-dsa-eu/](https://verfassungsblog.de/the-looming-enforcement-crisis-ai-dsa-eu/).

<sup>32</sup> Paul de Hert and Paweł Hadjuk, 'EU Cross-Regime Enforcement, Redundancy and Interdependence. Addressing overlap of enforcement structures in the digital sphere after *Meta*' (2024) *Technology and Regulation* 291, 296.

<sup>33</sup> Kasia Söderlund and Stefan Larsson, 'Enforcement Design Patterns in EU Law: An Analysis of the AI Act' (2024) 3(41) *Digital Society* 1, 5. Remarking on the differences regarding centralised enforcement structures when designed around EU enforcement networks and EU agencies, see Laurens van Kreijl, 'Towards a Comprehensive Framework for Understanding EU Enforcement Regimes' (2019) 10(3) *European Journal of Risk Regulation* 439, 441-442.

<sup>34</sup> This has led to intense experimentation with centralise enforcement, see Bieber and Maiani (n 17), 1059.

<sup>35</sup> As pointed out by Jakub Gren, David Howarth and Lucia Quaglia, 'Supranational Banking Supervision in Europe: The Construction of a Credible Watchdog' (2015) 53 *Journal of Common Market Studies* 181; and David Coen and John-Paul Salter, 'Multilevel Regulatory Governance: Establishing Bank-Regulator Relationships at the European Banking Authority' (2020) 22 *Business and Politics* 133.

fragmented along national lines, consisting of 27 different regulatory systems.<sup>36</sup> The failures in the implementation of EU law at the national level have led to a clear shift towards centralisation in EU enforcement.<sup>37</sup>

Decentralised enforcement structures correspond with the default method of enforcement of EU law. Member States establish the exact enforcement mechanisms to ensure compliance with EU rules at the national level. There is no single decentralised enforcement model that the EU legislator follows. Instead, they can take different forms, involving partial centralisation (ecosystem model) or harmonisation and penalty-setting corresponding to the EU level (cooperative federalism).<sup>38</sup> Competition policy is a prime example of a decentralised enforcement system, which combines partial centralisation by the European Commission when it acts as *primus inter pares*.<sup>39</sup>

Member State enforcement proves effective when the implementation of EU laws is correct and timely, when sufficient resources are made readily available for implementation, and when they are sufficiently committed to the enforcement process.<sup>40</sup> The greater the commitment of the Member States to jointly collaborate to achieve common policy objectives set at the EU level, the more effective decentralised enforcement structures will be.<sup>41</sup>

Within this constellation of enforcement structures, the digitalisation of our society has accelerated the pace of regulatory decision-making and policymaking by the EU in the field of digital technologies.<sup>42</sup> The protection of the individual and of the functioning of the internal market rests at the heart of the digital *acquis*, which is mainly sustained on the foundations of competition and consumer protection law.<sup>43</sup>

At the same time, the new technology-relevant regulatory interventions in the EU are driven by the policy experience surrounding the GDPR's enforcement. Several reasons,

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<sup>36</sup> European Commission, 'A comprehensive EU response to the financial crisis: A strong financial framework for Europe and a banking union for the eurozone' (10 July 2013), available at [https://ec.europa.eu/commission/presscorner/detail/en/memo\\_13\\_679](https://ec.europa.eu/commission/presscorner/detail/en/memo_13_679).

<sup>37</sup> Söderlund and Larsson (n 33), 6.

<sup>38</sup> Both categories are pointed out by de Hert and Hadjuk (n 32), 296-297.

<sup>39</sup> Stemming from the European Commission's and national competition authorities' position in Council Regulation (EC) No 1/2003 of 16 December 2002 on the implementation of the rules on competition laid down in Articles 81 and 82 of the Treaty [2003] OJ L 1/1.

<sup>40</sup> Miroslava Scholten, 'Chapter 2: EU (shared) law enforcement: Who does what and how?' in Stefano Montaldo, Francesco Costamagna and Alberto Miglio (eds.), *EU Law Enforcement* (Routledge 2021) 7.

<sup>41</sup> Söderlund and Larsson (n 33), 6.

<sup>42</sup> de Hert and Hadjuk (n 32), 292.

<sup>43</sup> *Ibid.*, 295.

such as the under-enforcement of specific national authorities,<sup>44</sup> the unequal application of the law across Member States, or a lack of explicit equality between national authorities, undermined the GDPR's coherent and uniform application.<sup>45</sup> The GDPR's two-tiered decentralised enforcement structure,<sup>46</sup> vesting an essential part of an EU law's tasks to Member State enforcement authorities complemented by boards at the EU level, is wholly unsuitable for reaching the effective enforcement threshold set by the legislator.

Despite the *faux pas*, the EC's policy based on the creation of a 'Europe fit for the Digital Age'<sup>47</sup> imitates the GDPR's foundational basis through the mimicking of its institutional design and substantive uniqueness.<sup>48</sup> The EU rules adopted to capture digital technologies establish an ecosystem of actors that imitates that of the GDPR, which introduced the distinctive notions of controller, processor, data subject, or recipient into the digital space.<sup>49</sup> The Digital Markets Act (DMA) introduces the distinguishing concepts of gatekeeper, business user, and end user,<sup>50</sup> even though competition law traditionally dealt with undertakings,<sup>51</sup> consumers, and competitors. The Data Act<sup>52</sup> integrates the GDPR's concept of a data subject, whilst it adds the characteristic notions of data holder and data recipient. As a result, the digital *acquis* is becoming more and more flooded with definitional inconsistencies across each rule, which can hinder a uniform application of those rules by the same sets of national authorities. The post-GDPR rules emulate some of the institutional idiosyncrasies of the EU's data protection regulation. The Data

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<sup>44</sup> Thomas Streinz, '29 – The Evolution of European Data Law' in Paul Craig and Gráinne de Búrca (eds.), *The Evolution of EU Law* (OUP 2021) 902-936, 914.

<sup>45</sup> Giulia Gentile and Orla Lynskey, 'Deficient by Design? The Transnational Enforcement of the GDPR' (2022) 71(4) *International & Comparative Law Quarterly* 799, 825-830.

<sup>46</sup> Gabriela Zafir-Fortuna, 'Follow the (personal) data: Positioning data protection law as the cornerstone of EU's 'Fit for the Digital Age' legislative package' (2024), available at <https://doi.org/10.2139/ssrn.4794182>.

<sup>47</sup> European Union, 'A Europe fit for the digital age: Empowering people with a new generation of technologies' (2019), available at [https://commission.europa.eu/strategy-and-policy/priorities-2019-2024/europe-fit-digital-age\\_en](https://commission.europa.eu/strategy-and-policy/priorities-2019-2024/europe-fit-digital-age_en).

<sup>48</sup> Papakonstantinou and de Hert (n 7), 52-56. The idea of regulatory uniqueness introduced by the GDPR is considered by Karen Yeung and Lee A. Bygrave, 'Demystifying the modernized European data protection regime: Cross-disciplinary insights from legal and regulatory governance scholarship' (2021) 16(1) *Regulation & Governance* 137.

<sup>49</sup> GDPR (n 6), Article 4. Here, the authors provide a few examples to demonstrate the point, whilst a full analysis of the four rules (DMA, DSA, AI Act and P2B Regulation) is performed in the following section.

<sup>50</sup> Digital Markets Act (n 8), Article 2.

<sup>51</sup> The concept of an undertaking in EU competition law is key to understand its application, as remarked by Marcos Araujo Boyd, *The notion of undertaking in EU Competition Law* (University of Glasgow, 2023).

<sup>52</sup> Regulation (EU) 2023/2854 of the European Parliament and of the Council of 13 December 2023 on harmonised rules on fair access to and use of data and amending Regulation (EU) 2017/2394 and Directive (EU) 2020/1828 (Data Act) [2023] OJ L 2854.

Governance Act<sup>53</sup> and the Digital Services Act (DSA) establish a wide array of competent authorities to monitor the enforcement of their rules and introduce different boards at the EU level<sup>54</sup> as the cooperation mechanisms that rein in their centralised application, much like the GDPR's own reliance on data protection supervisory authorities and the European Data Protection Board that ensure its consistent application.

Furthermore, the digital *acquis* is very much influenced by a sense of EU law brutality.<sup>55</sup> As proposed by Papakonstantinou and de Hert, EU law brutality encompasses the EU legislator's almost complete disregard of the Member States' own legal systems when regulating technology. The EU legislator does not cower from introducing new terms, procedures, principles, and state mechanisms into the Member States' legal systems under a top-down approach.<sup>56</sup> The instrument that the legislator chooses to force the Member States' hand is that of regulations, as opposed to the EU's long-drawn tradition of intervening in Member State legal systems through directives.<sup>57</sup> The legal operators at the national level are no longer left with any space for manoeuvre and adaptation to implement these digital-driven rules. Instead, they are forced to integrate their substantial tenets into their legal systems, despite the friction they may originate with existing national rules, and the backlash that it might spark as a consequence.

Stemming from the three main pillars that sustain enforcement in the digital space (a trend towards verticalization, GDPR mimesis, and EU law brutality), the paper engages in an analysis that does not conflict with the existing enforcement structures as designed by the EU legislator. Rather, it captures the other side of the argument from a functional perspective. Bearing in mind the mandated enforcement that the Member States must assume in implementing the digital *acquis*, the paper unveils the main trends that characterise their current implementation at the national level and distinguishes whether their institutional design prompts towards uniform application.

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<sup>53</sup> Regulation (EU) 2022/868 of the European Parliament and of the Council of 30 May 2022 on European data governance and amending Regulation (EU) 2018/1724 (Data Governance Act) [2022] OJ L 152/1.

<sup>54</sup> The primary EU board established by the Data Governance Act is the European Data Innovation Board, whereas the European Board for Digital Services holds the same role in the DSA framework.

<sup>55</sup> Papakonstantinou and de Hert (n 7), 56-57.

<sup>56</sup> *Ibid.*, 57.

<sup>57</sup> *Ibid.*, 57.

### III. THE LITMUS TEST OF ENFORCEMENT

The adoption of EU legislation through regulations and a progressively accelerating centralisation in enforcement entail that the application of digital rules is not merely an execution of delegated tasks but involves independent decision-making at the Member State level.<sup>58</sup> Due to this reason, the verticalization of enforcement and brutalism in EU law directly influence the lens under which one must observe and measure enforcement at the national level.

Both trends do not manifest in all rules in the same way or through the same tenets. Within the digital *acquis*, some rules are more centralised and verticalized than others, and the path dependencies of the fields of law that they cover differ from sector to sector. It is, however, true that Article 114 TFEU constitutes the Commission's preferred choice as a legal basis when regulating the digital single market.<sup>59</sup>

Due to its departure from traditional competition policy following a crisis in the application of competition law rules against Big Tech digital platforms, the DMA institutionalises a centralised enforcement structure where the European Commission holds the role as sole enforcer.<sup>60</sup> National authorities (mainly, national competition authorities) are called to play a supporting role to the EC's enforcement. The DMA clearly departs from the rationale of the GDPR's mimesis, and establishes its own high-level principles, inspired by EU competition law, rather than on the digital *acquis*.<sup>61</sup> The process of verticalization in the DMA is almost complete, and centralisation operates as the rule in enforcement, at least if one follows the letter of the law.<sup>62</sup>

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<sup>58</sup> The authors build their nuanced analysis on Eva G. Heidbreder, 'Strategies in multilevel policy implementation: Moving beyond the limited focus on compliance' (2017) 24(9) *Journal of European Public Policy* 1367, 1369.

<sup>59</sup> The choice has been termed as 'pragmatic' and not necessarily as an undisputed possibility, see Annegret Engel, 'Licence to Regulate: Article 114 TFEU as Choice of Legal Basis in the Digital Single Market' in Annegret Engel, Xavier Groussot and Gunnar Thor Petursson (eds.), *New Directions in Digitalisation* (Springer 2025), 13-28. Criticising its use in the DMA context, Alfonso Lamadrid de Pablo and Nieves Bayón Fernández, 'Why the Proposed DMA Might Be Illegal under Article 114 TFEU, and How to Fix It' (2021) 12(7) *Journal of European Competition Law & Practice* 576.

<sup>60</sup> Digital Markets Act (n 8), Recital 91.

<sup>61</sup> As pointed out by Papakonstantinou and de Hert (n 7), 54.

<sup>62</sup> Pointing out the existence of *de facto* decentralisation, find Ribera Martínez (n 9), 1111. On a different front, the application of the DMA (as well as the DSA and the GDPR) fragments consumer law, as shown by Francisco de Elizalde, 'Fragmenting Consumer Law Through Data Protection and Digital Market Regulations: The DMA, the DSA, the GDPR, and EU Consumer Law' (2025) 48 *Journal of Consumer Policy* 355.

Similar path dependencies can be found in the DSA, although they follow the complete opposite direction. The DSA builds on and furthers the aims and objectives of the e-Commerce Directive<sup>63</sup> within the same policy, prejudicing its approach. The DSA's supervisory model is, thus, influenced by the previous regulatory iteration (the country-of-origin principle<sup>64</sup>), whilst the GDPR's mimesis only plays a part in those cases where enforcement mechanisms are lacking.<sup>65</sup>

For those instances, the EU legislator takes recourse to the GDPR's partially centralised enforcement scheme, which attributes competences based on the subject matter. The EC has exclusive competence to monitor, investigate, and enforce obligations on Very Large Online Platforms (VLOPs) and Very Large Online Search Engines (VLOSEs) that are designated directly by it.<sup>66</sup> For explicitly detailed tasks in the regulation, the DSA delegates the implementation of its provisions to two different levels of national authorities: i) the designated Digital Services Coordinators supervising intermediary services established in their territory<sup>67</sup>; and ii) competent authorities regarding certain specific tasks or sectors that have not been particularly entrusted to the Digital Services Coordinators.<sup>68</sup> Most of the real-world enforcement that handles the problems and issues concerning the layman pertains to the second category. Thus, effectiveness depends on the choices that the Member States make when they designate those competent authorities.<sup>69</sup>

As opposed to the verticalized and centralised enforcement framework of the DMA, the DSA presents a hybrid approach where both the national and EU institutions seek to apply its provisions, without the conflicting and fragmentation-prone principles of the e-Commerce Directive. Path dependencies in this field stay at the decentralised enforcement structure, whilst there is a clear objective to harmonise the internal market

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<sup>63</sup> Directive 2000/31/EC of the European Parliament and of the Council of 8 June 2000 on certain legal aspects of information society services, in particular electronic commerce, in the Internal Market ('Directive on electronic commerce') [2000] OJ L 178/1.

<sup>64</sup> Alexandre de Streel and Martin Husovec, *The e-commerce Directive as the cornerstone of the Internal market* (IMCO Committee, May 2020), 40-42.

<sup>65</sup> Papakonstantinou and de Hert (n 7), 54.

<sup>66</sup> Digital Services Act (n 11), Article 65.

<sup>67</sup> For instance, Digital Services Coordinators can act with respect to conduct performed by providers of intermediary services via their intervention in the investigation and enforcement of these practices and facilitating mutual assistance with other authorities, see *ibid.*, Articles 49(2), 51 and 57.

<sup>68</sup> *Ibid.*, Articles 49(1) and 49(4).

<sup>69</sup> This is a trend that applies to other digital rules, such as the Digital Governance Act and the Data Act, see Joanna Mazur, 'Mapping the provisions on enforcement in Digital Markets Act, Digital Services Act, Data Governance Act, and Data Act' (2024), available at <https://dx.doi.org/10.2139/ssrn.4875848>.

for intermediary services to ensure a safe, predictable and trusted online environment.<sup>70</sup> Verticalization is less evident, but equally powerful, due to the high stakes involved within the EU institutions' role, to the extent that they are compelled to actively supervise, enforce and facilitate measures to ensure platform compliance, including the promotion of codes of conduct on particular topics,<sup>71</sup> the issuing of guidelines that compel platforms to strengthen their safety<sup>72</sup> or, even, facilitate the development of voluntary codes for the establishment of standards.<sup>73</sup> The verticalization of enforcement manifests in a substantial assumption by the EU institutions of the development of high-level principles that the national authorities applying them depend on.

Even in those cases where no path dependencies influence the legislation surrounding a regulatory object, the enforcement structures designed around them build on the GDPR blueprint. This is the particular case for the AI Act, which vests most of its competences on the Member States. Rather than incorporating existing institutional structures, the AI Act instructs each Member State to knit an enforcement framework consisting of national competent authorities, among which the market surveillance authorities act as an equivalent to the Digital Services Coordinators in the DSA.<sup>74</sup> Verticalization stems from the EU institutions' complementary role in conducting the oversight of the AI Act's implementation within the Member States, whilst they also hold the capacity of delegating acts, implementing acts, providing guidelines, and issuing decisions.<sup>75</sup> Both the DSA and the AI Act share the ecosystem model where parallel enforcement at the Member State level is combined with partially centralised (and verticalized) enforcement happening simultaneously at the EU level.<sup>76</sup>

Despite the varying degrees of centralisation of these digital rules (and the justification underlying the EU legislator's choice for one enforcement structure or the other), when one observes the enforcement of the digital *acquis* from a bottom-up approach, the same compliance difficulties surface in their application. Instead of focusing on the delegation of tasks from higher to lower levels, the effects of implementation involve multiple

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<sup>70</sup> The validity of such arguments is tested by Remy Chavannes and Karlijn van den Heuvel, 'The pre-emptive effect of the Digital Services Act' (EU Law Live Weekend Edition, 14 September 2024), number 198, available at [www.brinkhof.com/wp-content/uploads/2024/11/weekend\\_edition\\_198.pdf](http://www.brinkhof.com/wp-content/uploads/2024/11/weekend_edition_198.pdf).

<sup>71</sup> See, for instance, Digital Services Act (n 11), Articles 45(1), 46(1), 48(1) and 63(1)(e).

<sup>72</sup> *Ibid.*, Articles 25(3), 28(4), 35(3), 39(3), 61(2)(b) and 63(1)(e).

<sup>73</sup> *Ibid.*, Articles 44(1).

<sup>74</sup> Artificial Intelligence Act (n 12), Article 70, as analysed in Söderlund and Larsson (n 33), 40-41.

<sup>75</sup> *Ibid.*, Articles 6, 7, 41, 51, 68, 81 and 82.

<sup>76</sup> As pointed out by de Hert and Hadjuk (n 32), 297.

layers,<sup>77</sup> which are not particularly apparent to the naked eye. A top-down approach is implied when authors, for example, extract compliance indicators to capture how much room EU directives leave for interpretation in implementation and how technically complex the EU regulatory issue at stake is by focusing on the number of recitals of a given EU law.<sup>78</sup>

On the contrary, compliance research focuses on explaining under which conditions national actors implement EU law to disentangle (and justify) variance in compliance performances between Member States.<sup>79</sup> To do that, the paper presents the results of the thorough enquiry that its authors have made on the implementation at the national level of four digital rules: the DMA, the DSA, the AI Act, and the P2B Regulation.

Despite centralising efforts and verticalization-prone trends, the enforcement of the post-GDPR digital *acquis* hinges on three main trends. First, the *de facto* disruption of existing national frameworks in the fashion of EU law brutality, which disregards national idiosyncrasies both from the institutional and legal perspectives. Second, the incidental nature of the digital *acquis*' enforcement against the framework of its technical complexity and regulatory density. Third, the looming decentralisation that operates in practice in the enforcement of the digital *acquis*, irrespective of the type of enforcement structure chosen by the EU legislator.

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<sup>77</sup> Proposed in Heidbreder (n 58), 1369 building on the work of B. Guy Peters, 'Implementation structures as institutions' (2014) 29(2) *Public Policy and Administration*; and Herwig C.H. Hofmann, 'General Principles of EU law and EU administrative law' in Catherine Barnard and Steve Peers (eds.), *European Union Law*, (OUP 2014) 212-242.

<sup>78</sup> Remarkd on Hübner (n 19), 1819.

<sup>79</sup> Heidbreder (n 58), 1375. Traditional compliance research includes numerous case studies, such as Ellen Mastenbroek, 'EU compliance: Still a 'black hole'?', (2005) 12(6) *Journal of European Public Policy* 1103; Esther Versluis, 'Even rules, uneven practices: Opening the 'black box' of EU law in action' (2007) 30(1) *West European Politics* 50; and Gerda Falkner and Oliver Treib, *Compliance in the Enlarged European Union: Living Rights or Dead Letters?* (Routledge 2008).

## A. THE IMPRINT OF EU LAW BRUTALITY

To measure each of these manifestations, the paper applies a bottom-down approach demonstrating how enforcement of the post-GDPR digital rules crystallise at the national level.<sup>80</sup> For the particular case of EU law brutality, the paper tracks the immediate effects of the four selected digital rules (DMA, DSA, AI and P2B Regulation) at the national level. The best way to do that is to determine how many national rules have been impacted as a result of their introduction, as shown in Figure 1.

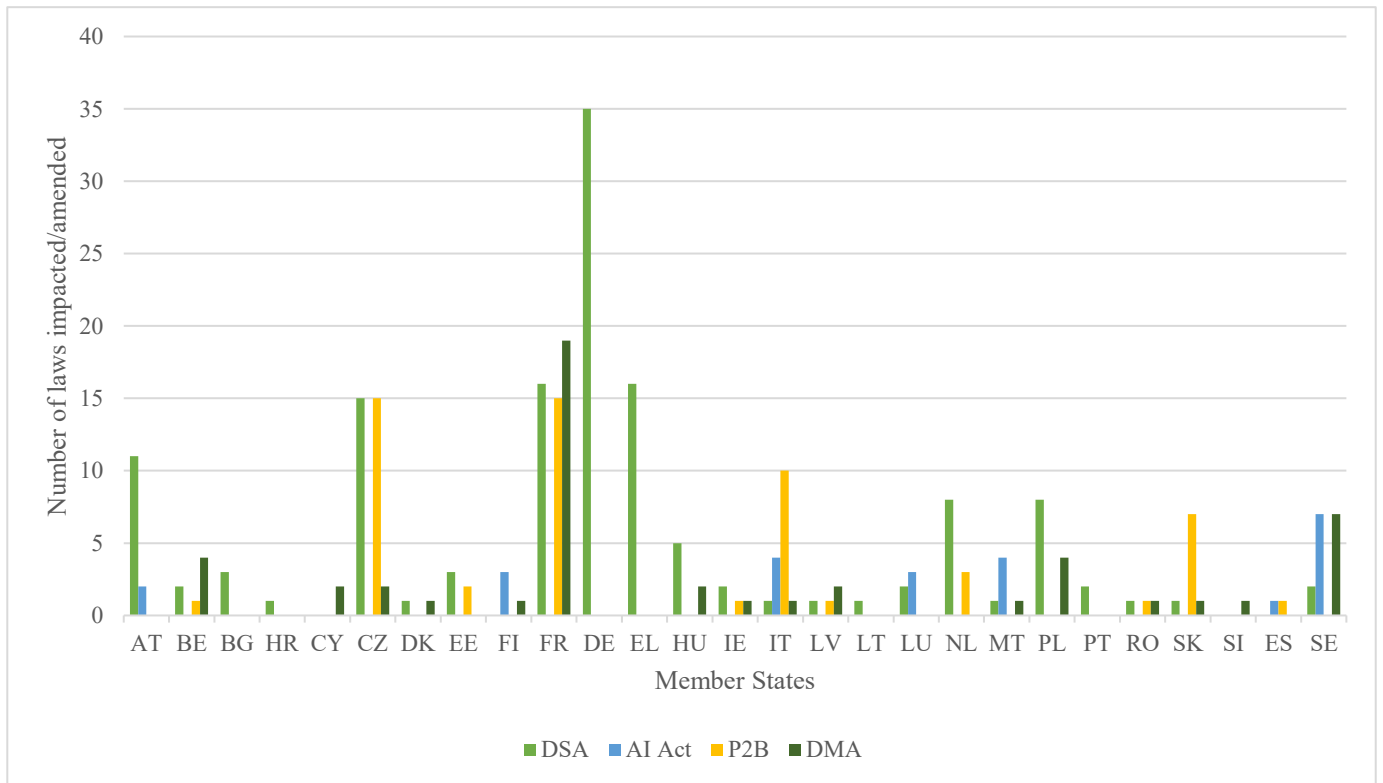


Figure 1. The impact of DSA, DMA, AI Act and P2B Regulation in national legal systems, measured in the number of laws impacted and amended as a consequence of their introduction.

The results highlight two main dynamics concerning the impact of the post-GDPR digital *acquis*, namely an asymmetric national impact and a higher number of amendments when a hybrid or decentralised enforcement structures are foreseen.

The data reveals two overarching dynamics. First, a significant asymmetry in the degree of national legislative disruption. A small number of Member States (in particular, the Czech Republic, France and Germany) emerge as clear outliers, with the highest number of national laws impacted by the introduction of the post-GDPR digital rules. In

<sup>80</sup> To do that, the groundwork of tracking all national developments of each of the rules is listed under Annex I, last updated in March 2026.

particular, Germany displays the highest number of amendments per regulation, with more than thirty legal instruments influenced by the implementation of the DSA, ranging from the Telecommunications Act and Youth Protection Act to sectoral regulatory statutes. If one streamlines the analysis, France exhibits the most extensive legislative amendments produced as a consequence of the digital *acquis*. These outliers can be explained by the density of pre-existing national regulatory frameworks governing digital services. Where more law already exists, more law is necessarily displaced or adjusted.

Second, a systematic relationship between the design of the enforcement architecture and the depth of that disruption. Figure 1 confirms that no Member State has escaped the legislative consequences of the digital *acquis*. Every single Member State has seen at least five national laws impacted or amended as a direct consequence of the introduction of the four digital rules. Such transformation represents a structural baseline of legislative disruption that the EU legislator imposes across heterogeneous legal systems simultaneously.

The design of the enforcement architecture significantly influences the degree of national legislative disruption at the Member State level. This is better illustrated by comparing the impact of the DSA and the DMA, with the first generating more amendments across Member States than the latter. The difference should not only be explained by the broader regulatory scope of the DSA,<sup>81</sup> but also, in our own view, from its hybrid enforcement structure, which combines the supervisory and coordinating role of the European Commission with a decentralised enforcement by national authorities. As Member States are required to designate and empower their Digital Services Coordinators and ensure the effective enforcement at national level, the DSA interacts with a wide range of domestic legal fields susceptible of being impacted. Conversely, the DMA relies on a highly centralised enforcement, which in turn limits the need for such an extensive legislative adjustment.

The uneven legislative responses to the digital *acquis* across Member States, even when they implement the same set of EU instruments, can be explained by the diversity of the institutional landscapes at national level. The P2B Regulation illustrates this phenomenon

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<sup>81</sup> Digital Services Act (n 11), Article 1(1) states that the aim of the Regulation is “to contribute to the proper functioning of the internal market for intermediary services by setting out harmonised rules for a safe, predictable and trusted online environment that facilitates innovation and in which fundamental rights enshrined in the Charter, including the principle of consumer protection, are effectively protected”.

clearly. As its enforcement relies primarily on existing national mechanisms, ranging from public to private enforcement, Member States have integrated it into different legal contexts, with some countries introducing minimal or no amendments, while others such as France and Italy incorporated the regulation across multiple sectoral regimes. Although the AI Act follows a hybrid enforcement system similar to that of the DSA, it displays relatively limited legislative changes across the Member States, which can be explained due to its recent adoption.

These findings speak directly to the concept of EU law brutality as a defining characteristic of the post-GDPR digital *acquis*. The EU legislator's disregard for the institutional and legal idiosyncrasies of Member States when constructing the architecture of digital regulation brings a particular poignant dynamic to the table. The post-GDPR digital rules impose their substantive content directly and uniformly in the form of regulations into legal systems that were not designed to receive. The legislative disruption recorded by Figure 1 is the direct consequence of Member States being required to accommodate regulatory architectures conceived without reference to the pre-existing domestic arrangements with which they inevitably collide.

Notwithstanding, if one observes the legal concepts that national legal systems have been forced to adapt as a consequence of the introduction of the post-GDPR digital *acquis*, the picture one can point out from Figure 1 is poignantly nuanced.<sup>82</sup> In general, there has been a broadly modest conceptual impact across Member States, i.e., national legal systems have not altered the existing concepts within their national regimes but have added new notions to their idiosyncratic national digital *acquis*. Enforcement structures serve as a moderating force on this type of national impact. The DSA, while displaying one of the higher conceptual footprints, operates through national authorities already familiar with the relevant legal domains, meaning that adaptation has built upon existing institutional and conceptual foundations rather than replacing them. The DMA's narrow conceptual impact across most Member States reinforces this reading. Centralised enforcement at the EC level has effectively insulated national legal systems from meaningful conceptual change, leaving domestic frameworks largely intact. This limited

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<sup>82</sup> A concept is impacted when a national implementing measure introduces, incorporates, or adapts a legal category into the domestic legal framework, even if by explicit reference to the Regulation. There is no such impact when the provision merely allocates competence, establishes procedures, or enforces obligations without creating or modifying the underlying legal category itself. Legal concepts, include, inter alia, intermediary service provider, content moderation, data access and master, business user, online interface, Artificial Intelligence, innovative technology, gatekeeper or core platform service.

footprint is precisely what one would expect of legislation that does not require national legal orders to rethink their underlying categories.

Taken together, Figures 1 and 2 provide the most granular evidence available for what this chapter has characterised as EU law brutality in the digital *acquis*. Across all 27 Member States, without exception, the introduction of the four digital rules has generated legislative and conceptual disruption. That reordering has been imposed through regulations and has proceeded with deliberate indifference to the pre-existing legal concepts and institutional arrangements that the Member States had previously embedded in their domestic frameworks. The asymmetry of its distribution and the systematic relationship between enforcement architecture and conceptual impact are not anomalies to be explained away. They are the structural consequences of a legislative strategy that treats harmonisation as an end sufficient to justify the institutional costs of achieving it, and that has consistently chosen to disregard the depth of those costs at the national level.

## **B. THE INCIDENTAL NATURE OF THE ENFORCEMENT OF POST-GDPR DIGITAL RULES**

The informational density of national implementation offers a distinct lens through which the structural dynamics of the post-GDPR digital *acquis* can be assessed. Unlike Figure 1, which measured the breadth and conceptual depth of legislative disruption across the Member States, one must turn to interrogate the qualitative texture of implementation. The Member States must adapt their legal systems to accommodate the institutional design of the rules of the digital *acquis*, but the degree of fidelity and ambition that they introduce is equally important to attaining their purposes.

Across the four digital rules examined in this chapter, the EU legislator has vested a remarkably wide array of competences in Member States' competent authorities, spanning investigative powers, enforcement and sanctioning functions, the accreditation of dispute resolution bodies, the certification of trusted flaggers, the supervision of codes of conduct, market surveillance obligations, conformity assessment procedures, and the facilitation of data access by vetted researchers.<sup>83</sup> The question that Figure 2 poses, illustrated through the DSA's implementation but reflective of broader patterns visible

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<sup>83</sup> See Digital Services Act (n 11), Articles 21, 22, 40 and 51.

across the digital *acquis*, is which of those competences Member States have chosen to develop with care, and which they have elected to ignore.

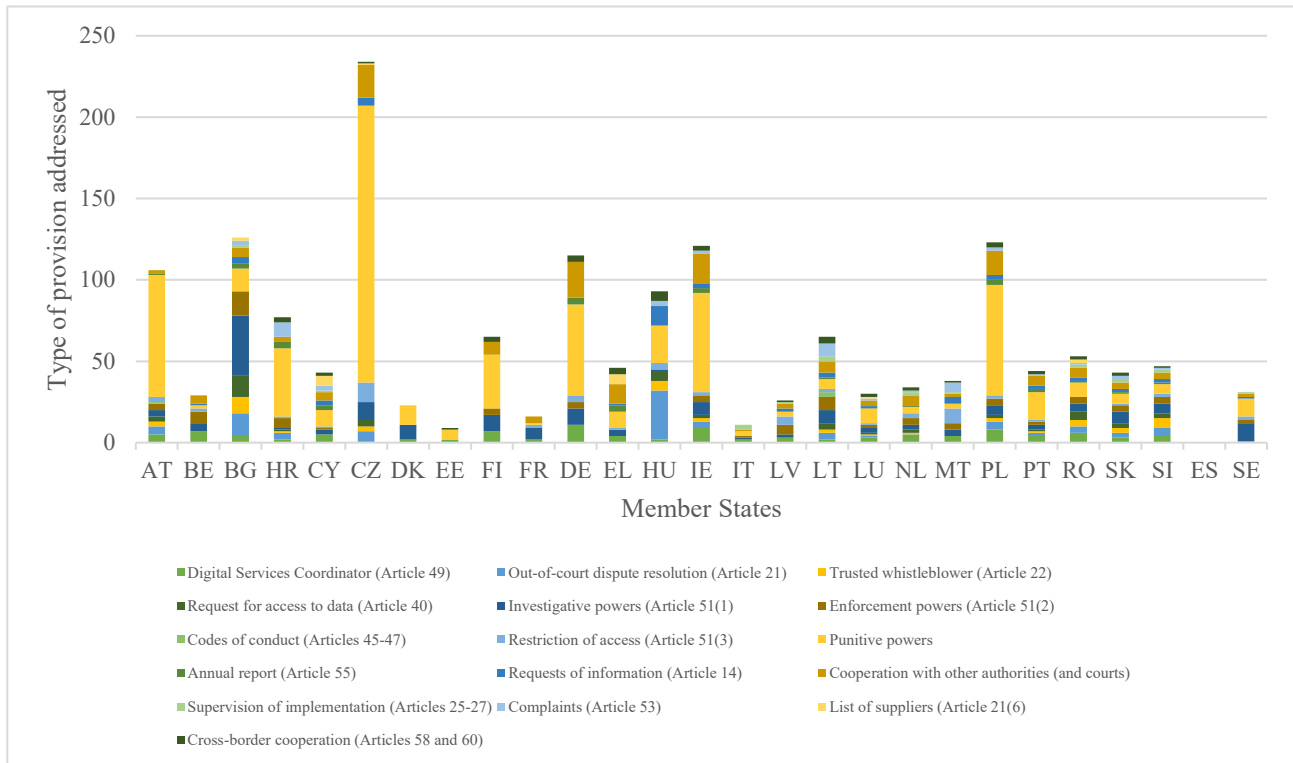


Figure 2. Distribution of provisions (and level of detail) in each of the Member State's DSA implementation.

The answer that emerges from the data is striking in its consistency across instruments. In the DSA, the provisions that have received the most detailed and elaborated treatment in national implementing legislation are overwhelmingly those relating to punitive powers, as shown in Figure 2. This reflects a deliberate and systematic prioritisation, on the part of national legislators, of the repressive dimension of the DSA's enforcement architecture at the expense of its other aspects.

The same logic manifests, in different institutional forms, across the other instruments. Under the DMA, Member States have been comparatively prompt in equipping their national competition authorities with the procedural tools needed to assist the EC in enforcement proceedings, whilst showing considerably less initiative in developing the monitoring roles that the regulation also contemplates. Under the P2B Regulation, the correlation between the presence of a dedicated public enforcement mechanism and compliance effectiveness reflects a similar underlying dynamic. Member States have engaged most substantively with the instrument where it offers a coercive enforcement hook, and most superficially where it requires the construction of novel institutional arrangements oriented towards transparency and redress. Under the AI Act, where

national implementation remains at an early stage, the preliminary legislative choices visible in the data already suggest that market surveillance authorities are receiving the most sustained institutional attention. In turn, the governance structure in charge of fundamental rights impact assessments, post-market monitoring, and civil society engagement remain largely undeveloped.

That selective prioritisation carries significant consequences for the overall effectiveness of the digital *acquis* as a governance project. None of the four instruments is designed around punitive powers alone. Where the Member States confine their implementation primarily to the sanctioning dimension, they effectively hollow out the remaining tenets of each rules' implementation. Notwithstanding, there might be a reason for that. National legislators engage most readily with those aspects of EU digital regulation that align with established domestic enforcement paradigms (the imposition of sanctions by a public authority) and resist most strongly those that require the construction of genuinely novel institutional arrangements. The ambition of these post-GDPR rules to pluralise platform governance runs against this institutional inertia, which is prevailing across jurisdictions and regardless of the instrument at hand.

As ever, this demonstrates that the enforcement of the digital *acquis* depends not only on the potency of the EU legislator's wishes to transform the digital space, but also on the willingness of the Member States to make enforcement happen in practice, regardless of the type of enforcement structures that the EU legislator sets at the highest level. The gap between the digital *acquis* as designed and as implemented is the product of a structural misalignment between the EU legislator's vision of digital governance and the domestic political economies that ultimately determine what enforcement looks like in practice.

Addressing this misalignment requires an honest reckoning with the limits of what harmonisation through regulation can achieve when the willingness to give full effect to that regulation, beyond its punitive aspects, remains predictably distributed across the Member States.

### C. *DE FACTO* DECENTRALISED ENFORCEMENT

The EU model of integration is based on the Member States' voluntary compliance with EU law.<sup>84</sup> Even if Member States fundamentally disagree with norms imposed at the EU level that they might not consider beneficial for them, they cannot selectively derogate EU legal provisions or choose not to comply with them. Some Member States deliberately choose to implement weak (in the case of the DSA) or even non-existent enforcement mechanisms (for some Member States in the context of the DMA) in their compliance with the progressively verticalized digital *acquis*.

The decentralisation of the enforcement structures surrounding the application of digital rules pre-empt the Member States' intervention, but not the intensity of such implementation. To avoid the EC's triggering of infringement proceedings,<sup>85</sup> Member States display a general tendency towards implementing those rules that impose minimum harmonisation requirements on them, whilst centralised enforcement structures are prone to reinstating passive perceptions at the national level with respect to the enforcement of EU laws.<sup>86</sup>

A holistic perspective on the decentralisation of the digital *acquis* must point to the notions of vertical and horizontal decentralisation. Horizontal decentralisation takes place when the distribution of enforcement responsibilities is done across multiple national authorities operating within the same legal system, reflecting the cross-sectoral reach of digital regulation and the diversity of pre-existing institutional national frameworks. Vertical decentralisation manifests when such distribution is operated in hierarchical order, ranging from the EU to the national level and including, in some cases, the private sector itself. These two dimensions define the practical architecture of digital enforcement across the Member States.

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<sup>84</sup> Case 294/83 *Parti écologiste "Les Verts" v European Parliament* [1986] ECR I-1339.

<sup>85</sup> As a matter of fact, some Member States do not even act in those particular cases, as seen in the infringement proceedings directed, in the case of the DSA, at Czechia, Cyprus, Estonia, Poland, Portugal and Slovakia on 24<sup>th</sup> April 2024; Belgium, Croatia, Luxembourg, Netherlands, Spain and Sweden on 25<sup>th</sup> July 2024; and Bulgaria, on 16<sup>th</sup> December 2024. In the case of five countries, namely Czechia, Cyprus, Poland, Portugal and Spain, there was a referral to the Court on 7<sup>th</sup> May 2025. The list is available at: <https://digital-strategy.ec.europa.eu/en/policies/dsa-dscs#1720699867912-2>. In the case of the AI Act, no infringement proceedings have been opened yet, despite the lack of designation of market surveillance authorities by several countries,

<sup>86</sup> For instance, many Member States decided to not pass any legislative amendments or developments as a consequence of the DMA, such as Austria, Bulgaria, Croatia, Estonia and Portugal, as set out in Figure 4 above.

Figure 3 illustrates the decentralised enforcement of the DSA. Vertical decentralisation at the national level operates across two tiers, comprising the designated Digital Services Coordinators and the competent authorities. Horizontal decentralisation occurs within the lower tier, where different competent authorities may be designated, reflecting both the cross-sectoral reach of the DSA, spanning telecommunications, media, consumer protection, financial services and data protection, and the pre-existing institutional landscape at the national level.

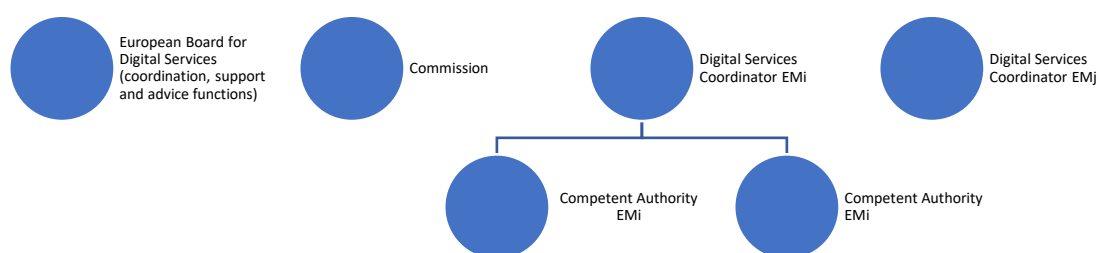


Figure 3. Vertical and horizontal decentralisation of the DSA.

Decentralisation operates as a gravitational force at the implementation stage of the digital *acquis* and helps explain the uneven response across the Member States. This is true regardless of the enforcement model prescribed by a given regulation and is visible from both horizontal and vertical perspectives. Without effective coordination mechanisms, decentralisation risks undermining the internal market objectives that the regulations were designed to serve.

With the exception of the DMA, EU digital regulation relies largely on decentralised enforcement architectures, in which the application of the rules is distributed across multiple institutional levels and authorities. Even where the regulatory framework takes the form of an EU regulation, its enforcement depends heavily on national implementation, and ultimately, on the design and empowerment of national authorities. As a result, the harmonisation goals pursued by these instruments<sup>87</sup> may be compromised by imbalanced implementation across national regulatory systems.

<sup>87</sup> See, in particular, Recitals 2 and 16 of the Digital Services Act (n 11), Recital 3 of the Artificial Intelligence Act (n 12), and Recital 7 of the P2B Regulation (n 13).

Figure 4 offers an entry point into this analysis through the lens of the DMA. The regulation is the most centralised of the four instruments examined in the chapter and, in principle, the least susceptible to the distortions introduced by decentralised national implementation.

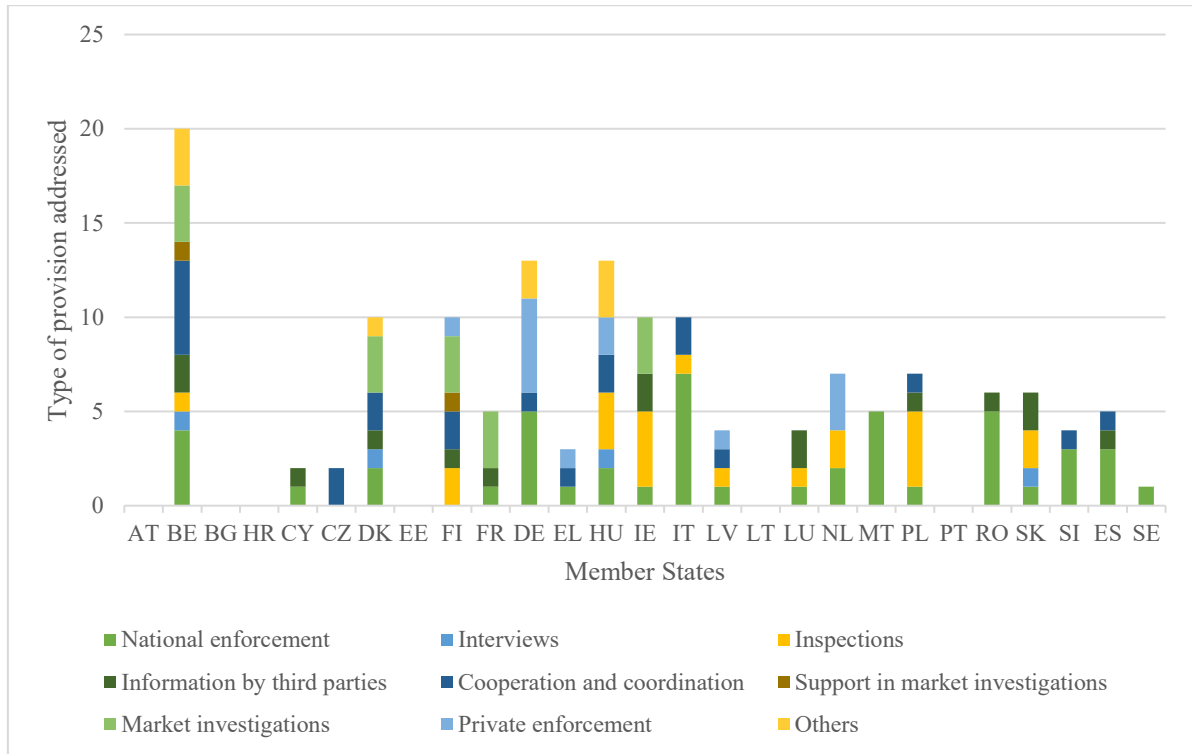


Figure 4. Distribution of provisions (and level of detail) in each of the Member State's DMA implementation.

Figure 4 maps the distribution of provisions addressed at the national level through implementing legislation. The data reveals that even within a centralised enforcement structure, the pattern of national legislative engagement is markedly uneven and selectively skewed towards those powers that confer punitive powers. National enforcement provisions and inspections consistently attract the most sustained legislative attention at the national level, whilst provisions relating to the supporting role of national authorities receive thinner treatment.

Even in an instrument whose enforcement logic is explicitly centralised, Member States reveal the same underlying preference that is visible across the digital *acquis*. They invest most in the dimensions of implementation that extend their punitive capacity, and least in those that require the construction of genuinely facilitative institutional roles.

Turning to horizontal decentralisation, Member States may designate different competent authorities responsible for different tasks within the same enforcement level. On one

hand, this is a natural response to the cross-sectoral reach of the digital *acquis*, by allowing the Member States to draw on sectoral expertise of pre-existing authorities while limiting the need to redesign national administrative framework. On the other hand, the Member States do not always incorporate these new requirements into their national frameworks in the same way or to the same extent, creating risks for the uniform enforcement of the regulations.

Figure 5 illustrates this tension through the DSA’s administrative structure at the national level. Given that the Member States invest less in the provisions concerning the supporting role of national authorities, path dependencies may play a significant role in the enforcement of digital regulations. Telecommunications regulators were the most common type of authority designated across the Member States, while five countries opted for consumer protection or competition authorities,<sup>88</sup> and only two countries opting for a specialised digital body.

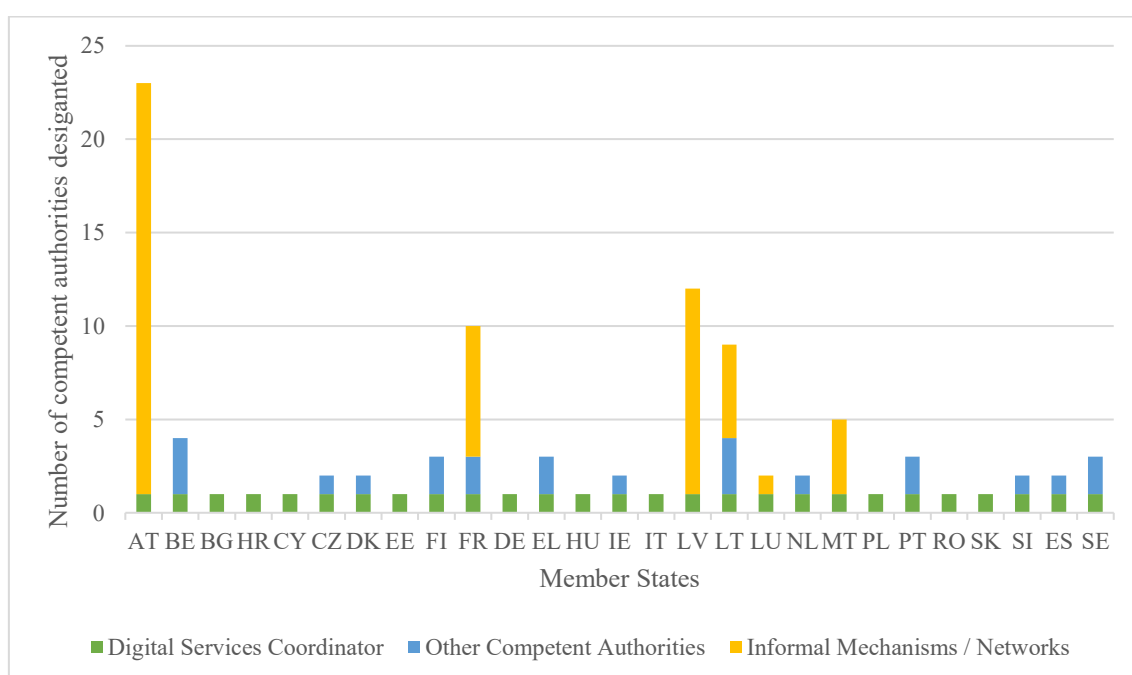


Figure 5. Number (and type) of authorities involved in the governance of the DSA in each Member State.

Alongside this horizontal dimension, EU digital regulation also features vertical decentralisation. Figure 6 illustrates the AI Act’s enforcement structure. Compared to the DSA, it introduces an additional vertical layer below the market surveillance authorities and notifying authorities responsible for supervising compliance. Notifying authorities

<sup>88</sup> Among these countries, the competition and consumer authorities have a role in the supervision and regulation of network industries in three cases (Spain, Estonia, Netherlands).

may designate notified bodies, as independent organisations that carry out pre-market conformity assessments,<sup>89</sup> which may in turn subcontract specific assessment tasks or engage subsidiaries, pushing vertical decentralisation further still.<sup>90</sup> The involvement of a greater number of authorities increases the importance of coordination within governance frameworks at both national and EU levels.

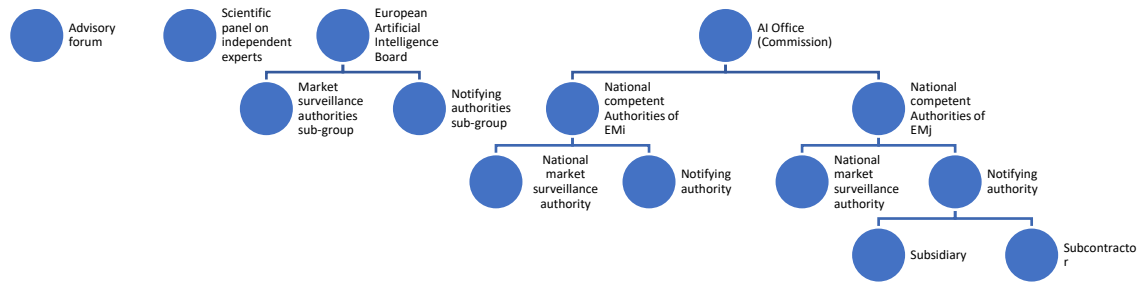


Figure 6. Vertical and horizontal decentralisation of the AI Act.

The example of notified bodies illustrates the inclusion of private organisations in the enforcement of the AI Act as a form of vertical decentralisation. The role of private enforcement is not, however, novel in the digital *acquis*. Among the regulations analysed in this paper, the P2B Regulation granted the greatest deference to the Member States regarding its enforcement, which could rely on courts for private enforcement.<sup>91</sup> The regulation’s first preliminary review identified a correlation between lower success rates and the absence of a public enforcement system, suggesting the limited effectiveness in those Member States where private enforcement was selected alone.<sup>92</sup>

Having said that, the design of a public enforcement system need not come at the expense of private participation. Under the P2B Regulation, for instance, business users retained the right to seek enforcement before competent national courts even where a public enforcement authority had been appointed.<sup>93</sup> Digital governance frameworks can benefit

<sup>89</sup> Artificial Intelligence Act (n 12), Articles 29-39.

<sup>90</sup> *Ibid.*, Article 33.

<sup>91</sup> P2B Regulation (n 13), Article 15 and Recital 46.

<sup>92</sup> European Commission, ‘Commission Staff Working Document Accompanying the Report on the Implementation of Regulation (EU) 2019/1150’ (European Commission, SWD(2023) 300 final), 26.

<sup>93</sup> European Commission, ‘Study on the Evaluation of Regulation (EU) 2019/1150’ (Publications Office of the European Union, 2023).

from the complementary role of private actors and specialised oversight bodies alongside public enforcement systems.

Figure 7 compares the weight of these complementary enforcement mechanisms across the P2B Regulation, the DSA, and the AI Act. It does so by computing the number of designated organisations, associations and public entities granted the right to take action before competent national courts under Articles 14(1) and 14(7) of the P2B Regulation,<sup>94</sup> the out-of-court dispute settlement bodies and trusted flaggers certified under Articles 21 and 22 DSA,<sup>95</sup> and the fundamental rights protection authorities with special powers under Article 77 AI Act.<sup>96</sup>

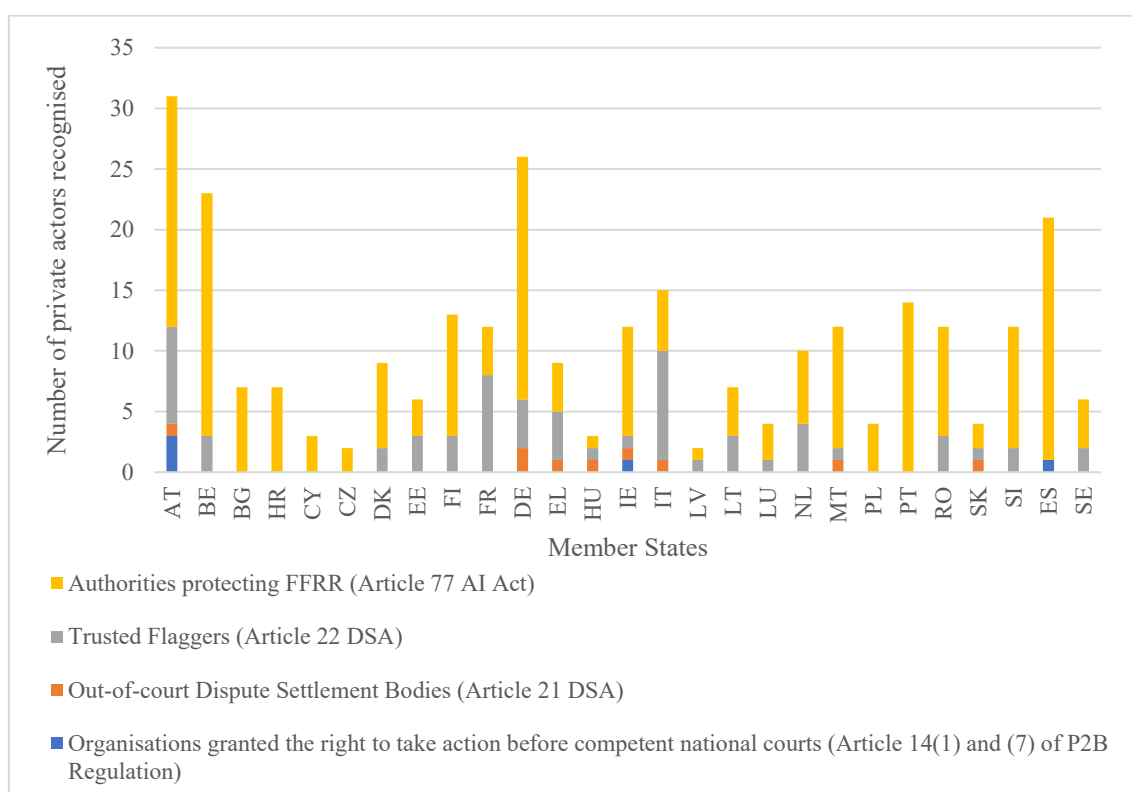


Figure 7. Number of private actors (by category) formally recognised in national frameworks under the DSA, the AI Act, and the P2B Regulation in each Member State.

The results highlight two main dynamics. First, the role of private actors varies considerably across the Member States. More than twenty are recognised in countries

<sup>94</sup> The list published by the European Commission can be found at <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A52021XC1005%2801%29&qid=167889469526>.

<sup>95</sup> The list of the out-of-court dispute settlement bodies and trusted flaggers certified under the DSA published by the European Commission can be found at <https://digital-strategy.ec.europa.eu/en/policies/dsa-out-court-dispute-settlement> and <https://digital-strategy.ec.europa.eu/en/policies/trusted-flaggers-under-dsa>, respectively.

<sup>96</sup> The fundamental rights protection authorities can be found at <https://digital-strategy.ec.europa.eu/en/policies/fundamental-rights-protection-authorities-ai-act>.

such as Austria, Germany or Spain, while several Member States record very low numbers. This deeper vertical decentralisation emerges as a coordination challenge. Second, across all of the Member States, authorities protecting fundamental rights under the AI Act make up the largest share of recognised actors and account for most of the variation between the Member States. Trusted flaggers under the DSA show a generally lower presence and uneven presence, while out-of-court dispute settlement bodies and organisations with litigation rights remain minimal in most Member States. Taken together, the predominantly public enforcement models of the DSA and the AI Act, as compared to the more deferential model of the P2B Regulation, do not exclude specialised authorities or private actors. If anything, they accommodate a broader range of them. The participation of private actors and fundamental rights authorities further expands the enforcement ecosystem.

If effectively coordinated, this multi-layered governance model can harness the benefits of specialised expertise and private support to ensure an effective multi-sectoral supervision of the complex issues arising in digital markets. The question remains whether coordination mechanisms are capable of resolving the institutional challenges posed by this multiplicity of actors, with the quality and consistency of national implementation emerging as a crucial factor.

From the perspective of *de facto* decentralisation, the litmus test of enforcement lies in how EU digital rules are operationalised within national systems. Regardless of the formal degree of centralisation, implementation consistently gravitates back to the Member States, where enforcement is shaped by the distribution of competences across multiple authorities and institutional layers.

The experience of the P2B Regulation illustrates the risks of leaving enforcement largely to national discretion, producing a highly fragmented landscape with uneven effectiveness. Subsequent instruments sought to address this fragmentation by imposing public enforcement models. Despite this shift, national governance frameworks remain markedly uneven. Even in highly centralised instruments such as the DMA, national engagement remains selective, while in hybrid models such as the DSA and the AI Act, horizontal and vertical decentralization produce divergent enforcement landscapes.

The picture that emerges from this analysis is one of structural fragmentation dressed in the language of harmonisation. The digital *acquis* is formally uniform, yet its practical

operation is anything but. Enforcement gravitates inexorably back to the national level, where it is filtered through divergent institutional landscapes and governance architectures that Member States have shaped, often deliberately, to suit their own priorities.

This reflects a deeper tension at the heart of the EU's regulatory model. The ambition to govern digital markets uniformly across 27 jurisdictions collides with the reality that those jurisdictions differ profoundly in their regulatory traditions, institutional capacities, and political appetites for enforcement. Centralised instruments such as the DMA demonstrate that even removing national enforcement discretion in principle does not eliminate national selectivity in practice. Decentralised instruments such as the DSA and the AI Act compound this further, multiplying the actors, levels and points of divergence through which EU law must pass before it reaches the market.

The consequence is a digital single market that is legally integrated but operationally fragmented. Until the EU develops coordination mechanisms with genuine teeth, the promise of the digital *acquis* will remain unevenly distributed across its intended beneficiaries.

#### IV. CONCLUSIONS

The empirical analysis presented in this chapter admits of no comfortable conclusion. The bottom-up mapping of the national implementation of the DMA, DSA, AI Act, and P2B Regulation across all 27 Member States reveals an enforcement landscape that is simultaneously more uneven and fragmented than the formal architecture of the EU's digital *acquis* would anticipate.

Three structural findings emerge with particular clarity. The first concerns the disruptive force of EU law brutality. The introduction of the post-GDPR digital instruments has generated significant legislative disruption across Member States. That disruption, however, is neither symmetrical nor predictable. A small number of Member States, notably Germany, France, and the Czech Republic, have absorbed the impact of the digital *acquis* with a degree of legislative thoroughness that stands in sharp contrast to the more minimalist responses observed elsewhere. The asymmetry cannot be explained solely by differences in national regulatory density, it also reflects divergent institutional capacities, political priorities, and degrees of commitment to the EU's digital governance project. The instruments and their enforcement systems matter too. The DSA, with its

hybrid enforcement architecture and cross-sectoral reach, has consistently generated broader and deeper legislative disruption than the DMA, whose centralised enforcement model reduces the surface area for national legislative engagement.

The second finding concerns the incidental character of digital enforcement. Compliance performance across the four instruments is marked by significant variance, driven not only by the complexity and density of the rules themselves, but also by the path dependencies of the national legal systems into which those rules are being inserted. Member States with established regulatory frameworks in adjacent fields, such as telecommunications, media regulation, or competition law, have in some cases been better positioned to adapt to the new digital rules. In others, the existence of entrenched institutional actors with conflicting competences has complicated rather than facilitated implementation. The P2B Regulation illustrates this dynamic with particular clarity. The correlation between the absence of a dedicated public enforcement mechanism and reduced compliance effectiveness confirms that the legislative choices made at the design stage have material consequences for enforcement outcomes in practice, yet those consequences are mediated in unpredictable ways by the institutional contexts in which implementation takes place.

The third and most structurally significant finding concerns the persistence of *de facto* decentralisation. Across all four instruments examined, and regardless of the enforcement model chosen by the EU legislator, decentralisation operates as a gravitational force at the implementation stage. Even in the DMA, national legislative responses have been uneven and selective. In the DSA and the AI Act, where enforcement formally combines EU-level oversight with national authority, the practical reality of implementation is one of horizontal fragmentation. Member States designate different authorities, draw competences along different institutional lines, and embed the new regulatory requirements within pre-existing frameworks with varying degrees of fidelity. The data on informational density and the designation of out-of-court bodies, trusted flaggers, and fundamental rights authorities further confirm that the multi-layered governance model that characterises the digital *acquis* generates coordination challenges that current institutional arrangements are not fully equipped to resolve.

These findings carry implications that extend beyond the immediate question of digital enforcement. At the most general level, they expose a fundamental tension in the EU's regulatory strategy. The choice of regulations as the instrument of harmonisation does

not, in and of itself, produce uniform enforcement. Formal uniformity at the legislative stage is not self-executing. It depends on the implementation choices made by the 27 Member States operating within heterogeneous institutional and political contexts. The assumption that the verticalization of enforcement, whether through centralised models like the DMA or through EU-level oversight in hybrid structures like the DSA and AI Act, will reliably counteract this structural tendency towards fragmentation is not borne out by the evidence. In each case, decentralisation reasserts itself because the structural conditions that give rise to enforcement heterogeneity cannot be legislated away.

What the EU's digital governance framework requires, the evidence suggests, is not simply more centralisation, but more institutionally grounded design. That means taking seriously the diversity of national legal systems at the legislative drafting stage, rather than treating it as a residual implementation problem to be managed after the fact. It means investing in coordination that can generate substantive convergence. And it also entails accepting that the effectiveness of the digital single market's regulatory architecture will ultimately be judged by the quality and consistency of the application of digital rules across the Member States.

## ANNEX 1

### DMA

Member States have adopted and proposed legislative developments relating to the DMA's execution. Out of the 27 Member States, 21 of them have decided to take such a course of action. Find in Table 1 the full description of their current state and their full references, as well as the list of national laws amended by the implementation. The visual representation of such amendments is provided in Figure 1.

*Table 1. National implementation of the DMA.*

Member State	Status	Full reference	National laws amended/impacted
Austria (AT)	None.	-	-
Belgium (BE)	Adopted and entered into force in May 2024.	Loi exécutant le règlement (UE) 2022/1925 du Parlement européen et du Conseil du 14 septembre 2022 relatif aux marchés contestables et équitables dans le secteur numérique et modifiant les directives (UE) 2019/1937 et (UE) 2020/1828 et modifiant diverses dispositions relatives à l'organisation et aux pouvoirs de l'Autorité belge de la concurrence [Act relating to Contestable and Fair Digital Markets], M.B., May 3, 2023, <a href="https://openjustice.be/fr/">etaamb.openjustice.be/fr/-</a> .	1. Code de Droit économique. 2. Loi coordonnée du 10 juillet 2008 sur les hôpitaux et autres établissements de soins. 3. Arrêté royal du 21 mai 2013 fixant le statut des membres du comité de direction et des assesseurs de l'Autorité belge de la Concurrence. 4. Arrêté royal du 21 mai 2013 fixant le programme et les modalités précises de l'examen d'aptitude professionnelle en vue de la nomination des membres du comité de direction et des assesseurs de l'Autorité belge de la Concurrence.
Bulgaria (BG)	None.	-	-
Croatia (HR)	None.	-	-
Cyprus (CY)	Proposed in April 2024 but pending public consultation.	<i>ΔΗΜΟΣΙΑ ΔΙΑΒΟΥΛΕΥΣΗ: Προσχέδιο νομοσχεδίου που τιτλοφορείται «ο περί της Προστασίας του Ανταγωνισμού (Τροποποιητικός) Νόμος του 2024»</i> , April 4, 2024, <a href="https://www.competition.gov.cy/competition/competition.nsf/All/9AD374928D9C996BC2258AF500258C84?OpenDocument">www.competition.gov.cy/competition/competition.nsf/All/9AD374928D9C996BC2258AF500258C84?OpenDocument</a> .	1. Protection of Competition Law 13(I)/2022 – amended by Draft Protection of Competition (Amendment) Law 2024. 2. Administration of Justice (Miscellaneous Provisions) Law 33/1964 – institutional implementation adjustments.
Czech Republic (CZ)	Adopted and entered into force in July 2023.	Zákon č 226/2023 Sb, kterým se mění zákon č 143/2001 Sb, o ochraně hospodářské soutěže a o změně některých zákonů ( <i>zákon o ochraně hospodářské soutěže</i> ), ve znění pozdějších předpisů, a zákon č 273/1996 Sb, o působnosti Úřadu pro ochranu hospodářské soutěže, ve znění pozdějších předpisů.	1. Act No. 143/2001 Coll. on the Protection of Economic Competition. 2. Act on the competence of the Office for the Protection of Economic Competition.
Denmark (DK)	Adopted and entered into force in January 2024.	2023/1 LSV 37 om supplerende bestemmelser til Europa-Parlamentets og Rådets forordning om digitale markeder.	Competition Act.
Estonia (EE)	None.	-	-
Finland (FI)	Proposed in September 2023.	<i>Digimarkkinasäädökseen liittyvä kansallinen sääntely</i> , April 18, 2024, <a href="https://tem.fi/en/project?tunnus=TEM045:00/2022">tem.fi/en/project?tunnus=TEM045:00/2022</a> .	Act on the Finnish Competition and Consumer Authority.

France (FR)	Adopted and entered into force in May 2024.	Loi 2024-449 du 21 mai 2024 visant à sécuriser et à réguler l'espace numérique [Law 2008-776 of May 21, 2024 on Digital Market Regulation] [J.O.] [OFFICIAL GAZETTE OF FRANCE], May 21, 2024, p. 21.	<ol style="list-style-type: none"> <li>1. Loi n° 2004-575 du 21 juin 2004 pour la confiance dans l'économie numérique.</li> <li>2. Loi n° 2020-936 du 30 juillet 2020 visant à protéger les victimes de violences conjugales.</li> <li>3. Loi n° 86-1067 du 30 septembre 1986 relative à la liberté de communication.</li> <li>4. Code pénal.</li> <li>5. Code de commerce.</li> <li>6. Code des postes et des communications électroniques.</li> <li>7. Loi n° 2021-1382 du 25 octobre 2021 relative à la régulation et à la protection de l'accès aux œuvres culturelle.</li> <li>8. Code de tourisme.</li> <li>9. Code de justice administrative.</li> <li>10. Code de l'organisation judiciaire</li> <li>11. Loi n° 86-1067 du 30 septembre 1986 relative à la liberté de communication.</li> <li>12. Loi relative à la lutte contre la manipulation de l'information.</li> <li>13. Code électoral.</li> <li>14. Loi n° 78-17 du 6 janvier 1978 relative à l'informatique, aux fichiers et aux libertés.</li> <li>15. Loi n° 47-585 du 2 avril 1947 relative au statut des entreprises de groupage et de distribution des journaux et publications périodiques.</li> <li>16. Loi n° 2017-261 du 1er mars 2017 visant à préserver l'éthique du sport, du code de la propriété intellectuelle.</li> <li>17. Loi n° 2021-1382 du 25 octobre 2021 relative à la régulation et à la protection de l'accès aux œuvres culturelles et du code pénal.</li> </ol>
Germany (DE)	Adopted and entered into force in November 2023.	Gesetz zur Änderung des Gesetzes gegen Wettbewerbsbeschränkungen und anderer Gesetze v. 25.10.2023 BGBl. 2023 I Nr. 294.	-
Greece (EL)	Adopted and entered into force in December 2023.	Nomos (2023:5019) ΝΟΜΟΣ ΥΠ' ΑΡΙΘΜ. 5019 ΦΕΚ Α 27/14.12.2023 [Law No. 5019], Ephemēris tes Kyverneseos tes Hellenikes Demokratias [E.K.E.D.] 2023, A:27 (Greece).	-
Hungary (HU)	Adopted and entered into force in January 2023.	2022. évi LV. törvény egyes igazságügyi tárgyú törvények módosításáról (Act on the amendment of certain judicial-related laws) (Hung).	<ol style="list-style-type: none"> <li>1. Act CVIII of 2001 on Certain Aspects of Electronic Commerce and Information Society Services.</li> <li>2. Act LVII of 1996 on the Prohibition of Unfair Trading Practices and Unfair Competition.</li> </ol>
Ireland (IE)	Adopted and entered into force in March 2024.	S.I. No. 117 of 2024 - European Union (Contestable and Fair Markets in the Digital Sector) Regulations 2024 (Ir.), <a href="http://www.irishstatutebook.ie/eli/2024/si/117/made/en/print">www.irishstatutebook.ie/eli/2024/si/117/made/en/print</a> .	Competition and Consumer Protection Act 2014 (via European Union (Contestable and Fair Markets in the Digital Sector) Regulations 2024).
Italy (IT)	Adopted and entered into force in December 2023 (and supplementing provision subject to public	<ol style="list-style-type: none"> <li>1- Legge annuale per il mercato e la concorrenza 2022, n. 214, G.U. Dec. 31, 2023, n. 303 (It.).</li> <li>2- Consultazione pubblica sullo schema di Regolamento sulle forme di collaborazione e cooperazione previste per l'attuazione del Digital Markets Act (It.).</li> </ol>	Law No. 287/1990 (Italian Competition Law).

	consultation until early July 2024).		
Latvia (LV)	Adopted and entered into force in March 2024.	<i>Grozījumi Konkurences likumā</i> , February 29, 2024, <a href="https://titania.saeima.lv/LIVS14/saeimalivs14.nsf/webSasaiste?OpenView&amp;restricttcategory=446/Lp14">titania.saeima.lv/LIVS14/saeimalivs14.nsf/webSasaiste?OpenView&amp;restricttcategory=446/Lp14</a> .	1. Competition Law 2. Civil Procedure Law
Lithuania (LT)	None.	-	-
Luxembourg (LU)	Adopted and entered into force in April 2024.	<i>Loi du 30 novembre 2022 relative à la concurrence</i> , April 2, 2024, <a href="https://legilux.public.lu/eli/etat/leg/loi/2022/11/30/a588/consolide/20240402">legilux.public.lu/eli/etat/leg/loi/2022/11/30/a588/consolide/20240402</a> .	-
The Netherlands (NL)	Proposed in March 2023.	<i>Wetsvoorstel tot uitvoering van de digitale marktenverordening</i> , March 3, 2023, <a href="https://www.internetconsultatie.nl/uitvoering/swetdma/document/11046">www.internetconsultatie.nl/uitvoering/swetdma/document/11046</a> .	-
Malta (MT)	Adopted and entered into force in August 2023.	<i>L.N. 200 of 2023</i> , August, 11, 2023, <a href="https://legislation.mt/eli/ln/2023/200/eng">legislation.mt/eli/ln/2023/200/eng</a> .	Competition Act (Cap. 379) (via Investigations in Support of the European Commission in the Digital Sector Regulations 2023).
Poland (PL)	Proposed a first legislative development in July 2023 (which was abandoned) and proposal of the second legislative development in April 2024.	1- <i>USTAWA z dnia o zmianie niektórych ustaw w celu ulepszenia środowiska prawnego i instytucjonalnego dla przedsiębiorców</i> , December, 2023. 2- <i>USTAWA z dnia ... 2024 r. o zmianie niektórych ustaw w celu zapewnienia stosowania przepisów unijnych po prawiających funkcjonowanie rynku wewnętrznego</i> , April 17, 2024, <a href="https://www.gov.pl/web/premier/projekt-ustawy-o-zmianie-niektorych-ustaw-w-celu-zapewnienia-stosowania-przepisow-unijnych-poprawiajacych-funkcjonowanie-rynku-wewnetrznego">www.gov.pl/web/premier/projekt-ustawy-o-zmianie-niektorych-ustaw-w-celu-zapewnienia-stosowania-przepisow-unijnych-poprawiajacych-funkcjonowanie-rynku-wewnetrznego</a> .	1. Act on Combating Unfair Competition (1993). 2. Act on Competition and Consumer Protection (2007). 3. Act on Concession Contracts (2016). 4. Public Procurement Law (2019).
Portugal (PT)	None.	-	-
Romania (RO)	Adopted and entered into force in December 2023.	<i>ORDONANȚĂ DE URGENȚĂ nr. 108 din 29 noiembrie 2023 pentru modificarea și completarea Legii concurenței nr. 21/1996, precum și a altor acte normative</i> , Romanian Official Gazette no. 1100 of 6 December 2023, <a href="https://legislatie.just.ro/Public/DetaliiDocumentAfis/277026">legislatie.just.ro/Public/DetaliiDocumentAfis/277026</a> .	Competition Act No. 21/1996 (amended by Emergency Ordinance 108/2023 – EGO 108).
Slovakia (SK)	Adopted and entered into force in April 2024.	<i>Návrh zákona, ktorým sa mení a dopĺňa zákon č. 187/2021 Z. z. o ochrane hospodárskej súťaže a o zmene a doplnení niektorých zákonov v znení zákona č. 309/2023 Z. z.</i> , November 29, 2023, <a href="https://rokovania.gov.sk/RVL/Material/29034/1">rokovania.gov.sk/RVL/Material/29034/1</a> .	Act No. 187/2021 Coll. on the Protection of Economic Competition.
Slovenia (SI)	Proposal submitted in October 2023.	<i>Zakon o spremembah in dopolnitvah Zakona o preprečevanju omejevanja konkurence (ZP OmK-1E)</i> , 26 January, 2023, <a href="https://pisrs.si/pregledPredpisa?id=ZAKO6615">pisrs.si/pregledPredpisa?id=ZAKO6615</a> .	Act on the Prevention of Restriction of Competition (ZPOmK-2).
Spain (ES)	Adopted and entered into force in June 2023.	Law on the adoption of certain measures in response to the economic and social consequences of the War in Ukraine, to support the reconstruction of the island of La Palma and other situations of vulnerability; transposition of European	-

		Union Directives on structural modifications of commercial companies and reconciliation of family life of parents and caregivers; and of the execution and compliance with European Union law (R.D.-Ley 2023, 5) (Spain).	
Sweden (SE)	Proposed in July 2023.	Promemoria - Nya bestämmelser i anslutning till konkurrensregelverket [Memorandum – new regulations in connection with competition regulation] (Swed.).	<ol style="list-style-type: none"> <li>1. Competition Act (2008:579).</li> <li>2. Public Access to Information and Secrecy Act (2009:400).</li> <li>3. Public Procurement Act (2016:1145).</li> <li>4. Act (2016:1146) on Procurement in the Supply Sectors.</li> <li>5. Act (2016:1147) on Procurement of Concessions.</li> <li>6. The proposals mean that the Act (2008:582) on block exemptions for specialization agreements restricting competition.</li> <li>7. Act (2008:583) on block exemptions for anticompetitive agreements on research.</li> </ol>

## DSA

Member States have adopted and proposed legislative developments relating to the DMA's execution. Out of the 27 Member States, only Spain does not have an implementing legislation in force. Find in Table 2 the full description of their current state and their full references, as well as the list of national laws amended by the implementation. The visual representation of such amendments is provided in Figure 1.

*Table 2. National implementation of the DSA.*

Member State	Status	Full reference	National laws amended/impacted
Austria (AT)	Adopted and entered into force 30 December 2023.	182nd Federal Law: DSA Accompanying Law, Issued on December 30, 2023. Bundesgesetz, mit dem das Koordinator-für-digitale-Dienste-Gesetz erlassen und das KommAustria-Gesetz, das E-Commerce-Gesetz, das Allgemeine bürgerliche Gesetzbuch, das Urheberrechtsgesetz, das Gerichtsgebührengesetz, das Mediengesetz, die Strafprozeßordnung 1975, das Staatsanwaltschaftsgesetz, das Bundesgesetz über die justizielle Zusammenarbeit in Strafsachen mit den Mitgliedstaaten der Europäischen Union, das Auslieferungs- und Rechtshilfegesetz und das Telekommunikationsgesetz 2021 geändert werden (DSA-Begleitgesetz – DSA-BegG), <a href="http://www.ris.bka.gv.at/Dokumente/BgblAuth/BGBLA_2023_I_182/BGBLA_2023_I_182.html">www.ris.bka.gv.at/Dokumente/BgblAuth/BGBLA_2023_I_182/BGBLA_2023_I_182.html</a>	<ol style="list-style-type: none"> <li>1. KommAustria Act.</li> <li>2. E-Commerce Act.</li> <li>3. General Civil Code.</li> <li>4. Copyright Act.</li> <li>5. Court Fees Act.</li> <li>6. Media Act.</li> <li>7. Code of Criminal Procedure 1975.</li> <li>8. Public Prosecutor's Office Act.</li> <li>9. Federal Act on Judicial Cooperation in Criminal Matters with the Member States of the European Union.</li> <li>10. Extradition and Mutual Legal Assistance Act.</li> <li>11. Telecommunications Act 2021.</li> </ol>
Belgium (BE)	Adopted the 21 April 2024; after infringement proceedings opened by the Commission.	Loi mettant en œuvre le règlement (UE) 2022/2065 du Parlement européen et du Conseil du 19 octobre 2022 relatif à un marché unique des services numériques et modifiant la directive 2000/31/CE, portant	<ol style="list-style-type: none"> <li>1. Book XII and Book XV of the Economic Law Code.</li> <li>2. Law of January 17, 2003, on the status of the regulator of the Belgian postal and telecommunications sectors.</li> </ol>

		modifications du livre XII et du livre XV du Code de droit économique et portant modifications de la loi du 17 janvier 2003 relative au statut du régulateur des secteurs des postes et des télécommunications belges, 21 April 2024, <a href="http://www.ejustice.just.fgov.be/mopdf/2024/05/15_1.pdf#Page10">www.ejustice.just.fgov.be/mopdf/2024/05/15_1.pdf#Page10</a>	
Bulgaria (BG)	Issued 21.11.2025, after infringement proceedings opened by the Commission.	акон за изменение и допълнение на Закона за електронните съобщения, <a href="http://dv.parliament.bg/DVWeb/showMaterialDV.jsp?jsessionId=12730BA0EF9BA0620A67C30F28F6BBD3?idMat=238812">dv.parliament.bg/DVWeb/showMaterialDV.jsp?jsessionId=12730BA0EF9BA0620A67C30F28F6BBD3?idMat=238812</a>	1. Electronic Communications Act. 2. Radio and Television Act. 3. Road Transport Act.
Croatia (HR)	Adopted March 28 2025; entered into force 18 April 2025, after infringement proceedings opened by the European Commission.	KONAČNI PRIJEDLOG ZAKONA O PROVEDBI UREDBE (EU) 2022/2065 EUROPSKOG PARLAMENTA I VIJEĆA OD 19. LISTOPADA 2022. O JEDINSTVENOM TRŽIŠTU DIGITALNIH USLUGA I IZMJENI DIREKTIVE 2000/31/EZ (AKT O DIGITALNIM USLUGAMA), drugo čitanje, P.Z.E br. 53 - predlagateljica: Vlada Republike Hrvatske, <a href="http://www.sabor.hr/hr/sjednice-sabora/konacni-prijedlog-zakona-o-provedbi-uredbe-eu-2022/2065-europskog-parlamenta-i?t=153666&amp;tid=213442">www.sabor.hr/hr/sjednice-sabora/konacni-prijedlog-zakona-o-provedbi-uredbe-eu-2022/2065-europskog-parlamenta-i?t=153666&amp;tid=213442</a>	Law on Electronic Commerce.
Cyprus (CY)	Adopted July 2025 after infringement and CJEU referral.	Ο περί της Εφαρμογής του Κανονισμού (ΕΕ) 2022/2065, σχετικά με την Ενιαία Αγορά Ψηφιακών Υπηρεσιών, Νόμος του 2025 (122(I)/2025), <a href="http://www.cylaw.org/nomoi/enop/non-ind/2025_1_122/full.html">www.cylaw.org/nomoi/enop/non-ind/2025_1_122/full.html</a>	-
Czech Republic (CZ)	Appointment of DSC adopted August 2023; implementing Act still pending after infringement procedure opened by the European Commission and referral to the CJUE.	Návrh zákona o digitální ekonomice a o změně některých souvisejících zákonů, <a href="http://odok.gov.cz/portal/veklep/material/ALBSCWAFVK4T/KORND2WHD822">odok.gov.cz/portal/veklep/material/ALBSCWAFVK4T/KORND2WHD822</a> ; <a href="http://www.zakonyprolidi.cz/media2/file/2512/Fil_e81009.pdf?attachment-filename=8194102-2025-11-27-text-navrhu-8211593.pdf">www.zakonyprolidi.cz/media2/file/2512/Fil_e81009.pdf?attachment-filename=8194102-2025-11-27-text-navrhu-8211593.pdf</a>	1. Act No. 480/2004 Coll. – Act on Certain Information Society Services. 2. Act No. 531/1990 Coll. – Act on Territorial Financial Authorities. 3. Act No. 455/1991 Coll. – Trade Licensing Act. 4. Act No. 634/1992 Coll. – Consumer Protection Act. 5. Act No. 280/2009 Coll. – Tax Code. 6. Act No. 127/2005 Coll. – Electronic Communications Act. 7. Health Services legislation. 8. Act No. 250/2016 Coll. – Act on Liability for Offences. 9. Criminal Code. 10. Copyright Act. 11. Act on Administrative Fees. 12. Act on On-Demand Audiovisual Media Services. 13. Civil Code. 14. Act on Special Court Proceedings. 15. Cybersecurity Act.
Denmark (DK)	Adopted 28 December 2023; in force 17 February 2024.	LOV nr 1765 af 28/12/2023, om håndhævelse af Europa-Parlamentets og Rådets forordning om et indre marked for digitale tjenester, <a href="http://www.retsinformation.dk/eli/lt/2023/1765">www.retsinformation.dk/eli/lt/2023/1765</a> .	Act No. 227 of 22 April 2002 on information society services.
Estonia (EE)	Adopted 4 June 2024, after infringement procedure opened by the European Commission.	12.06.2024 otsus nr 426, Infoühiskonna teenuse seaduse, autoriõiguse seaduse ja maksukorralduse seaduse muutmise seadus, 04.06.2024, <a href="http://www.riigiteataja.ee/akt/121062024001">www.riigiteataja.ee/akt/121062024001</a>	1. Information Society Services Act. 2. Copyright Act. 3. Taxation Act.

Finland (FI)	Adopted January 16, 2024.	18/2024 Laki verkon välityspalvelujen valvonnasta, <a href="http://www.finlex.fi/fi/lainsaadanto/saaduskokoelma/2024/18">www.finlex.fi/fi/lainsaadanto/saaduskokoelma/2024/18</a> .	-
France (FR)	Adopted 21 May 2024.	Loi visant à sécuriser et à réguler l'espace numérique (n° 2024-449 du 21 mai 2024), parue au <b>JO n° 117 du 22 mai 2024</b> , <a href="http://www.legifrance.gouv.fr/jorf/id/JORFTEXT000049563368">www.legifrance.gouv.fr/jorf/id/JORFTEXT000049563368</a>	<ol style="list-style-type: none"> <li>1. Law on Confidence in the Digital Economy.</li> <li>2. Data Protection Act (Informatics and Freedoms Act).</li> <li>3. Law on Freedom of Communication (Audiovisual Media Law).</li> <li>4. Law on the Status of Press Distribution Companies.</li> <li>5. Law on the Opening to Competition and Regulation of Online Gambling.</li> <li>6. Law on Regulation and Protection of Access to Cultural Works in the Digital Age.</li> <li>7. Criminal Code.</li> <li>8. Commercial Code.</li> <li>9. Consumer Code.</li> <li>10. Postal and Electronic Communications Code.</li> <li>11. Code on Relations between the public and the Administration.</li> <li>12. Intellectual Property Code.</li> <li>13. Internal Security Code.</li> <li>14. Sports Code.</li> <li>15. Criminal Procedure Code.</li> <li>16. Social Action and Families Code.</li> </ol>
Germany (DE)	Adopted 13 May 2024.	Gesetz zur Durchführung der Verordnung (EU) 2022/2065 des Europäischen Parlaments und des Rates vom 19. Oktober 2022 über einen Binnenmarkt für digitale Dienste und zur Änderung der Richtlinie 2000/31/EG sowie zur Durchführung der Verordnung (EU) 2019/1150 des Europäischen Parlaments und des Rates vom 20. Juni 2019 zur Förderung von Fairness und Transparenz für gewerbliche Nutzer von Online-Vermittlungsdiensten und zur Änderung weiterer Gesetze	<ol style="list-style-type: none"> <li>1. Federal Constitutional Protection Act.</li> <li>2. MAD Act.</li> <li>3. BND Act.</li> <li>4. Federal Police Act.</li> <li>5. Act on the Federal Network Agency for Electricity, Gas, Telecommunications, postal services and railways.</li> <li>6. Federal Data Protection Act.</li> <li>7. Telecommunications and Telemedia Data Protection Act.</li> <li>8. Act on the Interconnection of Federal and State Information Technology Networks – Act Implementing Article 91c Paragraph 4 of the Basic Law.</li> <li>9. De-Mail Act.</li> <li>10. Food and Feed Code.</li> <li>11. Youth Protection Act.</li> <li>12. Ordinance Implementing the Youth Protection Act.</li> <li>13. Federal Criminal Police Office Act.</li> <li>14. Deutsche Welle Act.</li> <li>15. Code of Criminal Procedure.</li> <li>16. Civil Code.</li> <li>17. Injunctions Act.</li> <li>18. Securities Trading Act.</li> <li>19. Investment Information Sheet Confirmation Ordinance.</li> <li>20. Act against Unfair Competition.</li> <li>21. Copyright Service Provider Act.</li> <li>22. Conditional Access Services Protection Act.</li> <li>23. Act to Combat Undeclared Employment.</li> <li>24. FIDE Directory Regulation.</li> <li>25. Customs Investigation Service Act.</li> <li>26. MTS Fuel Regulation.</li> <li>27. Real Estate Agent and Property Developer Ordinance.</li> </ol>

			<ul style="list-style-type: none"> <li>28. Network Enforcement Act.</li> <li>29. Feed Regulation.</li> <li>30. Fifth Book of the Social Code.</li> <li>31. Accessibility Improvement Act.</li> <li>32. Telecommunications Surveillance Ordinance.</li> <li>33. Regulation on Emergency Call Connections.</li> <li>34. Telecommunications Act.</li> <li>35. Third Act Amending the Telemedia Act.</li> </ul>
Greece (EL)	Adopted April 2024.	<p>Νόμος 5099/2024 - ΦΕΚ 48/Α/5-4-2024 (Κωδικοποιημένος)</p> <p>Λήψη μέτρων για την εφαρμογή του Κανονισμού (ΕΕ) 2022/2065 του Ευρωπαϊκού Κοινοβουλίου και του Συμβουλίου της 19ης Οκτωβρίου 2022 σχετικά με την ενιαία αγορά ψηφιακών υπηρεσιών και την τροποποίηση της Οδηγίας 2000/31/ ΕΚ («Πράξη για τις ψηφιακές υπηρεσίες», <a href="http://www.e-nomothesia.gr/kat-nomothesia-genikou-endiapherontos/n-5099-2024.html">www.e-nomothesia.gr/kat-nomothesia-genikou-endiapherontos/n-5099-2024.html</a>)</p>	<ul style="list-style-type: none"> <li>1. Law 4070/2012.</li> <li>2. Law 4821/2021.</li> <li>3. Law 4704/2020.</li> <li>4. Law 4954/2022.</li> <li>5. Law 4727/2020.</li> <li>6. Law 4961/2022.</li> <li>7. Law 5086/2024.</li> <li>8. Law 4957/2022.</li> <li>9. Law 4479/2017.</li> <li>10. Law 3463/2006.</li> <li>11. Law 4765/2021.</li> <li>12. Law 4781/2021.</li> <li>13. Law 4941/2022.</li> <li>14. Law 4664/2020.</li> <li>15. Law 4508/2017.</li> <li>16. Law 3731/2008.</li> </ul>
Hungary (HU)	Adopted December 2023.	<p>2023. évi CIV. törvény az internetes közvetítő szolgáltatások egyes szabályairól, <a href="http://nit.hu/jogszabaly/2023-104-00-00.7">nit.hu/jogszabaly/2023-104-00-00.7</a></p>	<ul style="list-style-type: none"> <li>1. Act LXXVI of 1999 on Copyright.</li> <li>2. Act CVIII of 2001 on certain issues of electronic commerce services and services related to the information society.</li> <li>3. Act CLXXXV of 2010 on Media Services and Mass Communication.</li> <li>4. Act CXCV of 2011 on the Economic Stability of Hungary.</li> <li>5. Act XXIII of 2023 on Cybersecurity Certification and Cybersecurity Supervision.</li> </ul>
Ireland (IE)	Adopted February 2024.	<p>Digital Services Act 2024, <a href="http://www.irishstatutebook.ie/eli/2024/act/2/enacted/en/print.html">www.irishstatutebook.ie/eli/2024/act/2/enacted/en/print.html</a></p>	<ul style="list-style-type: none"> <li>1. Competition and Consumer Protection Act 2014.</li> <li>2. Online Safety and Media Regulation Act 2022.</li> </ul>
Italy (IT)	Adopted September 2023.	<p>DECRETO-LEGGE 15 settembre 2023 , n. 123 . Misure urgenti di contrasto al disagio giovanile, alla povertà educativa e alla criminalità minorile, nonché per la sicurezza dei minori in ambito digitale, <a href="http://www.gazzettaufficiale.it/eli/id/2023/09/15/23G00135/sg">www.gazzettaufficiale.it/eli/id/2023/09/15/23G00135/sg</a></p>	<p>Law No. 249 of 31 July 1997, <i>Istituzione dell'Autorità per le garanzie nelle comunicazioni</i></p>
Latvia (LV)	Adopted June 2024.	<p>Grozījumi Informācijas sabiedrības pakalpojumu likumā Oficiālās publikācijas Nr.: <a href="http://2024/110.2">2024/110.2</a></p>	<p>Information Society Services Law.</p>
Lithuania (LT)	Adopted June 2024,	<p>INFORMACINĖS VISUOMENĖS PASLAUGŲ ĮSTATYMO NR. X-614 PAKEITIMO ĮSTATYMAS, Nr. XIV-2702, <a href="http://e-seimas.lrs.lt/portal/legalAct/lt/TAD/505ffdd22ef811efb121d2fe3a0eff27?positionInSearchResults=0&amp;searchModelUUID=cf31f850-630d-499d-bffa-6df03288cabf">e-seimas.lrs.lt/portal/legalAct/lt/TAD/505ffdd22ef811efb121d2fe3a0eff27?positionInSearchResults=0&amp;searchModelUUID=cf31f850-630d-499d-bffa-6df03288cabf</a>.</p>	<p>Law No. X-614 of the Republic of Lithuania on Information Society Services.</p>
Luxembourg (LU)	Adopted 4 April 2025, after infringement procedure opened by the European Commission.	<p>Loi du 4 avril 2025 portant mise en œuvre du règlement (UE) 2022/2065 du Parlement européen et du Conseil du 19 octobre 2022 relatif à un marché unique des services numériques et modifiant la directive 2000/31/CE,</p>	<ul style="list-style-type: none"> <li>1. Loi modifiée du 14 août 2000 sur le commerce électronique (Law on Electronic Commerce).</li> <li>2. Loi modifiée du 30 novembre 2022 relative à la concurrence (Competition Law).</li> </ul>

		<a href="https://legilux.public.lu/eli/etat/leg/loi/2025/04/04/a125/jo">legilux.public.lu/eli/etat/leg/loi/2025/04/04/a125/jo</a> .	
Malta (MT)	Adopted March 2024.	LN 666 of 2024 - Digital Services (Designation and Enforcement) Order, 2024, Government Gazette of Malta No. 21,206 – 12.03.2024, <a href="https://legislation.mt/eli/ln/2024/66/eng">legislation.mt/eli/ln/2024/66/eng</a>	Malta Communications Authority Act
Netherlands (NL)	Adopted February 2025, after infringement proceedings and referral to the CJEU.	Wet van 29 januari 2025 tot uitvoering van verordening (EU) 2022/2065 van het Europees Parlement en de Raad van 19 oktober 2022 betreffende een eengemaakte markt voor digitale diensten en tot wijziging van Richtlijn 2000/31/EG (Uitvoeringswet digitaal dienstenverordening), <a href="https://zoek.officielebekendmakingen.nl/stb-2025-21.html">zoek.officielebekendmakingen.nl/stb-2025-21.html</a> .	<ol style="list-style-type: none"> <li>1. Adaptation Act on the Directive on Electronic Commerce.</li> <li>2. General Administrative Law Act.</li> <li>3. Copyright Act.</li> <li>4. Civil Code.</li> <li>5. Consumer Protection Enforcement Act.</li> <li>6. Digital Markets Regulation Implementation Act.</li> <li>7. Code of Civil Procedure.</li> <li>8. Code of Criminal Procedure.</li> </ol>
Poland (PL)	Draft legislation; infringement and CJEU referral.	U S T AWA z dnia o zmianie ustawy o świadczeniu usług drogą elektroniczną oraz niektórych innych ustaw, <a href="https://legislacja.rcl.gov.pl/projekt/12383101/katalog/13045650#13045650">legislacja.rcl.gov.pl/projekt/12383101/katalog/13045650#13045650</a> .	<ol style="list-style-type: none"> <li>1. Act on Provision of Services by Electronic Means.</li> <li>2. Act of 17 June 1966 on enforcement proceedings in administration.</li> <li>3. Act of 29 December 1992 on Radio and Television Broadcasting.</li> <li>4. Act of 4 February 1994 on Copyright and Related Rights.</li> <li>5. Act of 30 June 2000 - Industrial Property Law.</li> <li>6. Act of 16 February 2007 on Competition and Consumer Protection.</li> <li>7. Act of 28 July 2023 on Combating Abuse in Electronic Communication.</li> <li>8. Act of 12 July 2024 - Electronic Communications Law.</li> </ol>
Portugal (PT)	Draft bill presented November 2024; infringement and CJEU referral.	Proposta de Lei n.º 32/XVI/1.ª, <a href="https://www.parlamento.pt/ActividadeParlamentar/Paginas/DetailIniciativa.aspx?BID=304312">www.parlamento.pt/ActividadeParlamentar/Paginas/DetailIniciativa.aspx?BID=304312</a>	Law No. 365/2002 on electronic commerce
Romania (RO)	Adopted 18 March 2024; in force 18 April 2024.	LEGE nr. 50 din 18 martie 2024 privind stabilirea unor măsuri pentru aplicarea Regulamentului (UE) 2022/2.065 al Parlamentului European și al Consiliului din 19 octombrie 2022 privind o piață unică pentru serviciile digitale și de modificare a Directivei 2000/31/CE (Regulamentul privind serviciile digitale), precum și pentru modificarea și completarea Legii nr. 365/2002 privind comerțul electronic, <a href="https://legislatie.just.ro/Public/DetailiiDocument/280106">legislatie.just.ro/Public/DetailiiDocument/280106</a>	<ol style="list-style-type: none"> <li>1. Decreto-Lei n.º 7/2004 (E-Commerce Law).</li> <li>2. Lei n.º 62/2013 (Judicial System Law).</li> </ol>
Slovakia (SK)	Adopted July 2024, after infringement procedure opened by the European Commission	Vládny návrh zákona, ktorým sa mení a dopĺňa zákon č. 264/2022 Z. z. o mediálnych službách a o zmene a doplnení niektorých zákonov (zákon o mediálnych službách) v znení neskorších predpisov a o zmene a doplnení niektorých zákonov, <a href="https://www.nrsr.sk/web/Default.aspx?sid=zakony/zakon&amp;MasterID=9794">www.nrsr.sk/web/Default.aspx?sid=zakony/zakon&amp;MasterID=9794</a>	Act No. 264/2022 Coll. on Media Services.
Slovenia (SI)	Adopted 26 March 2024; entered into force 13 April 2024.	Zakon o izvajanju Uredbe (EU) o enotnem trgu digitalnih storitev (ZIUETDS), Uradni list RS, št. 30/24, 95/24 – ZIUORTSV in 100/25 – ZS-1, <a href="https://pisrs.si/pregledPredpisa?id=ZAKO8805">pisrs.si/pregledPredpisa?id=ZAKO8805</a>	-
Spain (ES)	DSC designated January 2024; no implementing Act adopted;	(Implementing Act derogated).	<ol style="list-style-type: none"> <li>1. Act on Electronic Commerce and Other Information Society.</li> <li>2. Act on Liability for Electronic Bulletin Boards.</li> </ol>

	infringement and CJEU referral.		
Sweden (SE)	Adopted October 2024; after infringement procedure opened by the European Commission.	Lag (2024:954) med kompletterande bestämmelser till EU:s förordning om digitala tjänster, <a href="http://rkrattsbaser.gov.se/sfst?bet=2024:954">rkrattsbaser.gov.se/sfst?bet=2024:954</a>	-

## AI Act

Member States have adopted and proposed legislative developments relating to the AI Act's execution. Out of the 27 Member States, only 7 of them have already formally approved a legislative implementation. Table 3 the full description of their current state and their full references, as well as the list of national laws amended by the implementation.

*Table 3. National implementation of the AI Act.*

Member State	Status	Full reference	National laws amended/impacted
Austria (AT)	Implementing Act adopted on February 2024.	Bundesgesetz, mit dem das KommAustria-Gesetz und das Telekommunikationsgesetz 2021 geändert werden, <a href="http://BGBl. I Nr. 6/2024">BGBl. I Nr. 6/2024</a>	1. KommAustria Act (KOG). 2. Telecommunications Act 2021 (TKG 2021).
Belgium (BE)	None.		-
Bulgaria (BG)	Draft national AI bill proposed; not adopted yet.	Draft proposed: Законопроект за използването и развитието на изкуствения интелект, 51-554-01-183, <a href="http://www.parliament.bg/bg/bills/ID/166661">www.parliament.bg/bg/bills/ID/166661</a> (October 2025).	-
Croatia (HR)	None.		-
Cyprus (CY)	None.		-
Czech Republic (CZ)	Draft AI Act; not adopted.	Návrh zákona o umělé inteligenci a o změně zákona č. 87/2023 Sb., o dozoru nad trhem s výrobky a o změně některých souvisejících zákonů, ve znění pozdějších předpisů (not adopted), <a href="http://odok.gov.cz/portal/veklep/material/KORNDLSJSEUC/">odok.gov.cz/portal/veklep/material/KORNDLSJSEUC/</a> .	-
Denmark (DK)	Adopted May 2025.	LOV nr 467 af 14/05/2025, Lov om supplerende bestemmelser til forordningen om kunstig intelligens, <a href="http://www.retsinformation.dk/eli/ita/2025/467">www.retsinformation.dk/eli/ita/2025/467</a>	-
Estonia (EE)	None.		-
Finland (FI)	Proposed legislation; not adopted.	Utkast till regeringens proposition med förslag till lagstiftning om	1. Act on Market Surveillance of Certain Products.

		genomförande av förordningen om artificiell intelligens, VN/17593/2024, <a href="http://www.lausuntopalvelu.fi/SV/Proposal/Participation?proposalId=0e252297-c14b-4b6b-a0da-0a35756c9a90">www.lausuntopalvelu.fi/SV/Proposal/Participation?proposalId=0e252297-c14b-4b6b-a0da-0a35756c9a90</a> .	2. Act on the Financial Supervisory Authority. 3. Act on the Enforcement of Fines.
France (FR)	No formal designation adopted; supervisory framework proposed but pending adoption.	Les autorités compétentes pour la mise en œuvre du règlement européen sur l'intelligence artificielle, <a href="http://www.entreprises.gouv.fr/priorites-et-actions/transition-numerique/soutenir-le-developpement-de-lia-au-service-de-0">www.entreprises.gouv.fr/priorites-et-actions/transition-numerique/soutenir-le-developpement-de-lia-au-service-de-0</a>	-
Germany (DE)	Draft "KI Market Surveillance Act" (KIMÜG) published; not adopted.	Entwurf eines Gesetzes zur Durchführung der Verordnung (EU) 2024/1689 des Europäischen Parlaments und des Rates vom 13. Juni 2024 zur Festlegung harmonisierter Vorschriften für künstliche Intelligenz und zur Änderung der Verordnungen (EG) Nr. 300/2008, <a href="http://bmds.bund.de/service/gesetzgebungsverfahren/gesetz-zur-durchfuehrung-der-ki-verordnung">bmds.bund.de/service/gesetzgebungsverfahren/gesetz-zur-durchfuehrung-der-ki-verordnung</a>	-
Greece (EL)	None.	-	-
Hungary (HU)	Government Resolution adopted (May 2025); implementing legislation pending.	1301/2024. (IX. 30.) Korm. határozat a mesterséges intelligenciáról szóló európai parlamenti és tanácsi rendelet végrehajtásához szükséges intézkedésekről; 1149/2025. (V. 14.) Korm. Határozat, <a href="http://njt.hu/jogszabaly/2024-1301-30-22.1">njt.hu/jogszabaly/2024-1301-30-22.1</a> and a mesterséges intelligenciáról szóló európai parlamenti és tanácsi rendelet végrehajtásához szükséges intézkedésekről szóló <a href="http://1301/2024.(IX.30.)Korm.hatarozat">1301/2024. (IX. 30.) Korm. határozat</a> ban foglalt feladatok végrehajtásáról	-
Ireland (IE)	Authorities designated (2025) via statutory act, implementing legislation not yet adopted.	S.I. No. 366/2025 – European Union (Artificial Intelligence) (Designation) Regulations 2025; designation of Minister for Enterprise as single point of contact; Central Bank and Data Protection Commission as MSAs.	-
Italy (IT)	National AI framework law adopted (September 2025).	LEGGE 23 settembre 2025, n. 132, Disposizioni e deleghe al Governo in materia di intelligenza	1. Code of Civil Procedure. 2. Legislative Decree No. 82/2021.

		artificiale. (25G00143) ( <a href="#">GU Serie Generale n.223 del 25-09-2025</a> )	<ol style="list-style-type: none"> <li>3. Legislative Decree No. 22/2021.</li> <li>4. Legislative Decree No. 209/2023.</li> </ol>
Latvia (LV)	Adopted on March 2025.	Mākslīgā intelekta centra likums, likumi.lv/ta/id/359339-maksliga-intelekta-centra-likums	-
Lithuania (LT)	Adopted anuary 2025.	LIETUVOS RESPUBLIKOS INFORMACINĖS VISUOMENĖS PASLAUGŲ ĮSTATYMO NR. X-614 1, 2, 23 STRAIPSNIŲ IR PRIEDO PAKEITIMO ĮSTATYMAS, 2025 m. sausio 14 d. Nr. XV-106	-
Luxembourg (LU)	Draft Implementing Act	Projet de loi portant mise en oeuvre de certaines dispositions du règlement (UE) 2024/1689 du Parlement européen et du Conseil du 13 juin 2024 établissant des règles harmonisées concernant l'intelligence artificielle et modifiant les règlements (CE) n° 300/2008, (UE) n° 167/2013, (UE) n° 168/2013, (UE) 2018/858, (UE) 2018/1139 et (UE) 2019/2144 et les directives 2014/90/UE, (UE) 2016/797 et (UE) 2020/1828 (règlement sur l'intelligence artificielle) et portant modification de : 1° la loi du 1er août 2018 portant organisation de la Commission nationale pour la protection des données et du régime général sur la protection des données ; 2° la loi modifiée du 23 décembre 1998 portant création d'une commission de surveillance du secteur financier ; 3° la loi modifiée du 7 décembre 2015 sur le secteur des assurances <a href="http://www.chd.lu/fr/dossier/8476">www.chd.lu/fr/dossier/8476</a>	<ol style="list-style-type: none"> <li>1. La loi du 1er août 2018 portant organisation de la Commission nationale pour la protection des données et du régime général sur la protection des données.</li> <li>2. La loi modifiée du 23 décembre 1998 portant création d'une commission de surveillance du secteur financier.</li> <li>3. La loi modifiée du 7 décembre 2015 sur le secteur des assurances.</li> </ol>
Malta (MT)	Adopted on June 2024.	XIX of 2024 – Malta Digital Innovation Authority (Amendment) Act, 2024, <i>Government Gazette of Malta No. 21,266 – 14.06.2024</i> <a href="http://legislation.mt/eli/cap/591/eng">legislation.mt/eli/cap/591/eng</a>	<ol style="list-style-type: none"> <li>1. Malta Digital Innovation Authority Act (Cap. 591).</li> <li>2. Administrative Justice Act (Cap. 490).</li> <li>3. Innovative Technology Arrangements and Services Act (Cap. 592).</li> <li>4. Innovative Technology Arrangements and Services (Fees)</li> </ol>

			Regulations (S.L. 592.01).
Netherlands (NL)	None	-	-
Poland (PL)	Draft AI Act; not adopted.	Projekt ustawy o systemach sztucznej inteligencji, UC71, <a href="http://www.gov.pl/web/premier/projekt-ustawy-o-systemach-sztucznej-inteligencji">www.gov.pl/web/premier/projekt-ustawy-o-systemach-sztucznej-inteligencji</a>	-
Portugal (PT)	Authorities designated (September 2025), no implementing act.		-
Romania (RO)	Draft Bill, not adopted.	<a href="#">L255/2024</a> , Propunere legislativă privind Inteligența Artificială	-
Slovakia (SK)	Draft AI Act implementation bill; not adopted.	Draft AI Act Implementation Bill (not adopted).	-
Slovenia (SI)	Draft Act, not yet adopted.	Zakon o izvajanju Uredbe (EU) o določitvi harmoniziranih pravil o umetni inteligenci of 1.10.2025, <a href="http://e-uprava.gov.si/si/drzava-in-druzba/e-demokracija/predlogi-predpisov/predlog-predpisa.html?id=17671&amp;lang=si">e-uprava.gov.si/si/drzava-in-druzba/e-demokracija/predlogi-predpisov/predlog-predpisa.html?id=17671&amp;lang=si</a>	-
Spain (ES)	Royal Decree adopted on 2023, and Draft Bill prepared in 2025.	Real Decreto 729/2023, de 22 de agosto, por el que se aprueba el Estatuto de la Agencia Española de Supervisión de Inteligencia Artificial, <a href="http://www.boe.es/eli/es/rd/2023/08/22/729">www.boe.es/eli/es/rd/2023/08/22/729</a> . And ANTEPROYECTO DE LEY PARA EL BUEN USO Y LA GOBERNANZA DE LA INTELIGENCIA ARTIFICIAL, <a href="http://avance.digital.gob.es/layouts/15/HttpHandlerParticipacionPublicaAnexos.ashx?k=19128">avance.digital.gob.es/layouts/15/HttpHandlerParticipacionPublicaAnexos.ashx?k=19128</a>	Real Decreto 403/2020, de 25 de febrero, which develops the basic organic structure of the Ministry of Economic Affairs and Digital Transformation.
Sweden (SE)	None.	-	-

## P2B Regulation

Member States have adopted and proposed legislative developments relating to the P2B Regulation. Out of the 27 Member States, 9 of them opted for a private enforcement system. Table 3 provides the full description of their current state and their full references, as well as the list of national laws amended by the implementation (if any).

Table 4. Implementation of the P2B Regulation.

Member State	Status	Full reference	
Austria (AT)	No specific standalone implementing act; enforced through	Bundesgesetz gegen den unlauteren Wettbewerb 1984 – UWG StF: BGBl. Nr. 448/1984 (WV),	-

	competition/unfair competition framework (private enforcement).	www.wipo.int/wipolex/en/legislation/details/18685  Bundesgesetz über die Einrichtung einer Bundeswettbewerbsbehörde (Wettbewerbsgesetz – WettbG) StF: <a href="#">BGBl. I Nr. 62/2002</a> (NR: GP XXI RV 1005 AB 1047 S. 97. BR: <a href="#">6612 AB 6618 S. 686.</a> ).	
Belgium (BE)	Implemented through administrative allocation to Economic Inspection (public enforcement).	CHAMBRE DES REPRÉSENTANTS DE Belgique, 29 octobre 2021, Note de politique générale, <a href="#">www.lachambre.be/doc/flwb/pdf/55/2294/55k2294005.pdf#search=%22p2b%22</a>	Code of Economic Law.
Bulgaria (BG)	Implemented via amendments allowing private enforcement before general courts.	Граждански процесуален кодекс (ГПК), <a href="#">lex.bg/laws/ldoc/2135512224</a> , Chapter 13, Code of Civil Procedure, Electronic Commerce Act, ammended by SG No. 97/10.11.2020	-
Croatia (HR)	Adopted (public enforcement).	Zakon o provedbi Uredbe (EU) 2019/1150 o promicanju pravednosti i transparentnosti za poslovne korisnike usluga internetskog posredovanja NN 138/20 na snazi od 19.12.2020, <a href="#">www.zakon.hr/z/2695/zakon-o-provedbi-uredbe-%28eu%29-2019-1150-o-promicanju-pravednosti-i-transparentnosti-za-poslovne-korisnike-usluga-internetskog-posredovanja</a>	-
Cyprus (CY)	Adopted (public enforcement).	Zakon o provedbi Uredbe (EU) 2019/1150 o promicanju pravednosti i transparentnosti za poslovne korisnike usluga internetskog posredovanja, <a href="#">narodne-novine.nn.hr/clanci/sluzbeni/2020_12_138_2624.html</a>	-
Czech Republic (CZ)	Adopted (public enforcement).	ZÁKON ze dne ... 2026 o digitální ekonomice a o změně některých souvisejících zákonů, <a href="#">www.psp.cz/sqw/text/tiskt.sqw?O=10&amp;CT=69&amp;CT1=0</a>	-
Denmark (DK)	Adopted specific P2B Enforcement Act (public enforcement).	LOV nr 740 af 30/05/2020, Lov om håndhævelse af Europa-Parlamentets og Rådets forordning om fremme af retfærdighed og gennemsigtighed for brugere af onlineformidlingstjenester, <a href="#">www.retsinformation.dk/eli/ta/2020/740</a>	-
Estonia (EE)	Implemented via amendment to Information Society Service Act (public enforcement).	17.06.2021 otsus nr 756, Infoühiskonna teenuse seaduse muutmise seadus Vastu võetud 12.06.2021, <a href="#">www.riigiteataja.ee/akt/122062021013</a>	1. Technical Norms and Standards Act. 2. Information Society Services Act.
Finland (FI)	Adopted; private enforcement model.	Laki verkossa toimivia välityspalveluja ja hakukoneita koskevasta kieltomenettelystä, 464/2020, <a href="#">www.finlex.fi/fi/lainsaadanto/saaduskokoelma/2020/464</a>	-
France (FR)	Adopted; public enforcement.	<a href="#">Loi n° 2020-1508</a> du 3 de décembre 2020 portant diverses dispositions d'adaptation au droit de l'Union européenne en matière économique et	1. Code de la consommation.

		financière through public enforcement (Directorate General for Competition, Consumer Affairs and Fraud Prevention). .	<ol style="list-style-type: none"> <li>2. Code des postes et des communications électroniques.</li> <li>3. Code de commerce.</li> <li>4. Code des douanes.</li> <li>5. Code général des impôts.</li> <li>6. Code monétaire et financier.</li> <li>7. Code des assurances.</li> <li>8. Code rural et de la pêche maritime.</li> <li>9. Code de l'énergie.</li> <li>10. Code de la santé publique.</li> <li>11. Ordonnance n° 2015-953 du 31 juillet 2015 relative à la réforme de l'ordre des vétérinaires est ratifiée.</li> <li>12. La loi n° 47-1564 du 23 août 1947 relative à l'institution d'un ordre national des vétérinaires est abrogée.</li> <li>13. L'ordonnance n° 2011-78 du 20 janvier 2011 relative aux conditions dans lesquelles certains actes peuvent être réalisés par des personnes n'ayant pas la qualité de vétérinaire est ratifiée.</li> <li>14. Code général des collectivités territoriales.</li> <li>15. Code de la propriété intellectuelle.</li> </ol>
Germany (DE)	No standalone act; enforced under unfair competition law (private enforcement).	Gesetz gegen den unlauteren Wettbewerb – UWG), <a href="http://www.gesetze-im-internet.de/englisch_uwg/englisch_uwg.html">www.gesetze-im-internet.de/englisch_uwg/englisch_uwg.html</a>	-
Greece (EL)	Adopted; public enforcement.	NΟΜΟΣ ΥΠ' ΑΡΙΘΜ. 4753 ΦΕΚ Α΄ 227/18.11.2020 Λήψη συμπληρωματικών μέτρων για την εφαρμογή του Κανονισμού (ΕΕ) 2019/1150 του Ευρωπαϊκού Κοινοβουλίου και του Συμβουλίου της 20ής Ιουνίου 2019 για την προώθηση της δίκαιης μεταχείρισης και της διαφάνειας για τους επιχειρηματικούς χρήστες επιγραμμικών υπηρεσιών διαμεσολάβησης (L 186), ρυθμίσεις για τη Δωπηρεσιακή Μονάδα Ελέγχου Αγοράς, την Επιτροπή Ανταγωνισμού, τη λειτουργία της αγοράς και λοιπές διατάξεις., <a href="http://www.kodiko.gr/nomothesia/document/653403/nomos-4753-2020">www.kodiko.gr/nomothesia/document/653403/nomos-4753-2020</a> .	-
Hungary (HU)	No specific implementation adopted.		-
Ireland (IE)	Adopted implementing regulations (public enforcement).	SI No 256 of 2020 European Union (Promoting Fairness and Transparency for Business Users of Online	Consumer Protection Act 2007.

		Intermediation Services) Regulations 2020, <a href="https://enterprise.gov.ie/en/legislation/si-no-256-of-2020.html">enterprise.gov.ie/en/legislation/si-no-256-of-2020.html</a>	
Italy (IT)	Implemented through Budget Law provisions and AGCOM designation (public enforcement).	Ripubblicazione del testo della legge 30 dicembre 2020, n. 178, recante: «Bilancio di previsione dello Stato per l'anno finanziario 2021 e bilancio pluriennale per il triennio 2021-2023», corredato delle relative note, <a href="http://www.gazzettaufficiale.it/eli/gu/2021/01/18/13/so/3/sg/pdf">www.gazzettaufficiale.it/eli/gu/2021/01/18/13/so/3/sg/pdf</a>	<ol style="list-style-type: none"> <li>1. Law No. 249 of 31 July 1997 (Communications Regulatory Authority).</li> <li>2. Law No. 416 of August 5, 1981.</li> <li>3. Law No. 223 of August 6, 1990.</li> <li>4. Presidential Decree No. 268 of April 27, 1982, Presidential Decree No. 49 of February 15, 1983.</li> <li>5. Presidential Decree No. 27 of March 27, 1992.</li> <li>6. Law No. 633 of 22 April 1941.</li> <li>7. Legislative Decree no. 487 of 1 December 1993.</li> <li>8. Law no. 71 of 29 January 1994.</li> <li>9. Legislative Decree no. 545 of 23 October 1996.</li> <li>10. Law No. 287 of 10 October 1990.</li> </ol>
Latvia (LV)	Implemented via Information Society Services Law (public enforcement).	Informācijas sabiedrības pakalpojumu likums, Latvijas Vēstnesis, 183, 17.11.2004.; Latvijas Republikas Saeimas un Ministru Kabineta Ziņotājs, 23, 09.12.2004, <a href="http://likumi.lv/ta/id/96619-informacijas-sabiedribas-pakalpojumu-likums">likumi.lv/ta/id/96619-informacijas-sabiedribas-pakalpojumu-likums</a>	Information Society Services Law.
Lithuania (LT)	No specific implementing act; private enforcement via general courts.		-
Luxembourg (LU)	Adopted implementing law (private enforcement).	Loi du 5 mars 2021 relative à certaines modalités de mise en œuvre du règlement (UE) n° 2019/1150 du Parlement européen et du Conseil du 20 juin 2019 promouvant l'équité et la transparence pour les entreprises utilisatrices de services d'intermédiation en ligne, <a href="http://legilux.public.lu/eli/etat/leg/loi/2021/03/05/a185/jo">legilux.public.lu/eli/etat/leg/loi/2021/03/05/a185/jo</a>	-
Malta (MT)	Adopted implementing regulation (private enforcement).	Regolamenti dwar Miżuri ta' Infurzar fir-rigward ta' Servizi tal-Intermedjazzjoni Online għall-Utenti Kummerċjali, <a href="http://legislation.mt/eli/sl/399.49/mlt">legislation.mt/eli/sl/399.49/mlt</a>	-
Netherlands (NL)	Adopted (public enforcement).	Wet publiek toezicht en handhaving verordening bevordering billijkheid en transparantie voor zakelijke gebruikers van onlinetussenhandelsdiensten, <a href="http://wetten.overheid.nl/BWBR0050295/2024-11-08">wetten.overheid.nl/BWBR0050295/2024-11-08</a>	<ol style="list-style-type: none"> <li>1. General Administrative Law Act.</li> <li>2. Civil Code.</li> <li>3. Code of Civil Procedure.</li> </ol>
Poland (PL)	Implemented via Act on Combating Unfair Competition (mixed/private-oriented enforcement).	USTAWA z dnia 16 kwietnia 1993 r. o zwalczaniu nieuczciwej konkurencji, <a href="http://sip.lex.pl/akty-prawne/dzu-dziennik-ustaw/zwalczanie-nieuczciwej-konkurencji-16795259">sip.lex.pl/akty-prawne/dzu-dziennik-ustaw/zwalczanie-nieuczciwej-konkurencji-16795259</a>	-
Portugal (PT)	Adopted (public enforcement).	Decreto-Lei n.º 68/2023 de 16 de agosto de 2023,	Competition Law No. 21/1996.

		<a href="files.diariodarepublica.pt/1s/2023/08/15800/0000400008.pdf">files.diariodarepublica.pt/1s/2023/08/15800/0000400008.pdf</a>	
Romania (RO)	Adopted Government Emergency Ordinance (public enforcement).	ORDONANȚĂ DE URGENȚĂ nr. 23 din 31 martie 2021 privind măsurile de punere în aplicare a Regulamentului (UE) 2019/1.150 al Parlamentului European și al Consiliului din 20 iunie 2019 privind promovarea echității și a transparenței pentru întreprinderile utilizatoare de servicii de intermediere online, precum și pentru modificarea și completarea <a href="#">Legii concurenței nr. 21/1996</a>	-
Slovakia (SK)	Implemented via amendment to competition law (public enforcement).	Návrh zákona, ktorým sa mení a dopĺňa zákon č. 187/2021 Z. z. o ochrane hospodárskej súťaže a o zmene a doplnení niektorých zákonov v znení zákona č. 309/2023 Z. z., 29.11.2023, <a href="http://rokovania.gov.sk/RVL/Material/29034/1">rokovania.gov.sk/RVL/Material/29034/1</a>	<ol style="list-style-type: none"> <li>1. Act No. 136/2001 Coll. on Protection of Competition.</li> <li>2. Decree of the Antimonopoly Office of the Slovak Republic No. 169/2014 Coll.</li> <li>3. Decree of the Antimonopoly Office of the Slovak Republic No. 170/2014 Coll.</li> <li>4. Decree of the Antimonopoly Office of the Slovak Republic No. 171/2014 Coll.</li> <li>5. Decree of the Antimonopoly Office of the Slovak Republic No. 172/2014 Coll.</li> <li>6. Measure No. 1/2017 of the Antimonopoly Office of the Slovak Republic.</li> <li>7. Act No. 162/2015 Coll. Administrative Court Procedure.</li> </ol>
Slovenia (SI)	No specific implementation; private enforcement.		Law 59/2003 on Electronic Signature.
Spain (ES)	Implemented via amendment to Law 34/2002 (public enforcement).	Amendment to Ley 34/2002, de 11 de julio, de servicios de la sociedad de la información y de comercio electrónico (Art. 35), <a href="http://www.boe.es/buscar/act.php?id=BOE-A-2002-13758&amp;p=20250123&amp;tn=0">www.boe.es/buscar/act.php?id=BOE-A-2002-13758&amp;p=20250123&amp;tn=0</a> .	-
Sweden (SE)	Adopted supplementary provisions act (public).	Förordning (2020:516) med kompletterande bestämmelser till EU:s plattformsförordning, <a href="http://rkrattsbaser.gov.se/sfst?bet=2020:516">rkrattsbaser.gov.se/sfst?bet=2020:516</a> and Lag (2020:514) med kompletterande bestämmelser till EU:s plattformsförordning, <a href="http://rkrattsbaser.gov.se/sfst?fritext=2020%3A514&amp;upph=false&amp;post_id=2">rkrattsbaser.gov.se/sfst?fritext=2020%3A514&amp;upph=false&amp;post_id=2</a>	-